

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No.
Court File No.

16A07843
27-CR-19-922

State of Minnesota,

Plaintiff,

vs.

JEREMY KEE ANDERSON DOB: 01/25/1971

929 PORTLAND AVENUE
#2701
Minneapolis, MN 55441

Defendant.

COMPLAINT

Warrant

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: Identity Theft-Transfers/Possesses/Uses Identity of Other Person

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5), 609.527.7

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 07/20/2015

Control #(ICR#): 16000643

Charge Description: That between 7/20/2015 and 8/17/15, in Hennepin County, Minnesota, JEREMY KEE ANDERSON, transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet an unlawful activity and the value of the money or property or services the defendant received aggregated a total loss of more than \$35,000.

COUNT II

Charge: Identity Theft-Transfers/Possesses/Uses Identity of Other Person

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5), 609.527.7

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 09/02/2015

Control #(ICR#): 16000643

Charge Description: That between 9/2/2015 and 9/15/15, in Hennepin County, Minnesota, JEREMY KEE ANDERSON, transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet an unlawful activity and the value of the money or property or services the defendant received aggregated total loss of more than \$35,000.

COUNT III

Charge: Identity Theft-Transfers/Possesses/Uses Identity of Other Person

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5), 609.527.7

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 09/18/2015

Control #(ICR#): 16000643

Charge Description: That between 9/18/2015 and 9/29/15, in Hennepin County, Minnesota, JEREMY KEE ANDERSON, transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet an unlawful activity and the value of the money or property or services the defendant received aggregated a total loss of more than \$35,000.

COUNT IV

Charge: Identity Theft-Transfers/Possesses/Uses Identity of Other Person

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5), 609.527.7

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 10/07/2015

Control #(ICR#): 16000643

Charge Description: That between 10/7/2015 and 10/29/15, in Hennepin County, Minnesota, JEREMY KEE ANDERSON, transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet an unlawful activity and the value of the money or property or services the defendant received aggregated a total loss of more than \$35,000.

COUNT V

Charge: Identity Theft-Transfers/Possesses/Uses Identity of Other Person

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5), 609.527.7

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 11/06/2016

Control #(ICR#): 16000643

Charge Description: That between 11/6/2016 and 11/25/15, in Hennepin County, Minnesota, JEREMY KEE ANDERSON, transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet an unlawful activity and the value of the money or property or services the defendant received aggregated a total loss of more than \$35,000.

COUNT VI

Charge: Identity Theft-Transfers/Possesses/Uses Identity of Other Person

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5), 609.527.7

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 12/01/2015

Control #(ICR#): 16000643

Charge Description: That between 12/1/2015 and 12/30/15, in Hennepin County, Minnesota, JEREMY KEE ANDERSON, transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet an unlawful activity and the value of the money or property or services the defendant received aggregated a total loss of more than \$35,000.

COUNT VII

Charge: Identity Theft-Transfers/Possesses/Uses Identity of Other Person

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5), 609.527.7

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 01/05/2016

Control #(ICR#): 16000643

Charge Description: That between 1/5/2016 and 2/23/16, in Hennepin County, Minnesota, JEREMY KEE ANDERSON, transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet an unlawful activity and the value of the money or property or services the defendant received aggregated a total loss of more than \$35,000.

STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

Complainant reports that in 2012, C.A., a known adult male, was a chiropractor practicing in Minneapolis, Hennepin County, Minnesota. That year he met JEREMY KEE ANDERSON, Defendant herein. Defendant operated a pain clinic in Minnetonka called Interventional Pain Clinic (hereinafter IPC). C.A. learned that Defendant was also director/president of a Florida company called Tri-Med Corporation (hereinafter Tri-Med) which bought and sold medical receivables. A medical receivable is debt owed by an insurance company to a surgical center or pain clinic for care provided to a covered patient. A surgical center or pain clinic will often sell such debt for less than the value to maintain business cash flow. The medical receivable buyer receives the insurance company payout in an amount greater than the purchase price, thereby making a profit on the investment. Each medical receivable has a Letter of Protection from an attorney which states that the patient has a legal representative and a monetary settlement is pending. The process to purchase these receivables was to review the file and buy those with the best potential for favorable financial settlement.

Complainant reports that in 2014, C.A. and Defendant began discussing setting up a business in medical receivables. Defendant registered Smart Surgical Funding with the Minnesota Secretary of State as a limited liability company on behalf of C.A. C.A. obtained a Federal tax identification number and opened a bank account at US Bank. Defendant stated that he would be the "middle man" between C.A. and the person/entity selling the medical debt. Defendant told C.A. that the person selling the medical receivables was G.S. Defendant said that G.S. owned a group of surgery centers in Florida. G.S. is a known adult male residing in the State of Florida and legitimately sells medical receivables. C.A. was unaware that G.S. would not do business with Defendant because Defendant was involved with criminal activity in Florida.

In May of 2014, C.A. purchased his first medical receivable file from Defendant. C.A. paid \$27,856.53 for a debt valued at \$55,000. C.A. wrote a check to IPC and believed that the money was going to G.S. The documentation of the medical receivable included G.S.'s name. G.S. states that he did not sell this medical receivable and did not sign the documents.

In July, 2015, C.A. began purchasing more medical account receivable files. He gave money to Florida Surgical Consultants, LLP (hereinafter FLSUCO) which C.A. believed was owned by G.S. FLSUCO was actually an entity established by Defendant. The following are those purchases:

1. Between July 20, 2015, and August 15, 2015, C.A. purchased 10 medical receivable files. He made five payments to FLSUCO, totaling \$72,280. Based on Defendant's representations, C.A. believed that these were actual medical receivables and that they were purchased through G.S. All of the debt assignments had G.S.'s name on them. G.S. did not place his name on the documents and did not sell these receivables to C.A. None of the files were legitimate medical receivables. Three of the false receivable documents had the names of three known adults who did not permit their names to be on the documents. They are T.W., C.G. and P.S.

2. Between September 2, 2015, and September 15, 2015, C.A. purchased four medical receivables. He made four payments to FLSUCO, totaling \$107,180. He purchased the files believing that he was buying them from G.S. All of the debt assignments had G.S.'s name on them. G.S. did not place his name on the documents and did not sell these receivables to C.A. None of the files were legitimate. One of the false receivable documents had the names of one known adult who did not permit his name to be on the documents. That victim is A.L.

3. Between September 18, 2015, and September 29, 2015, C.A. purchased five medical receivable files. He made five payments to FLSUCO, totaling \$124,009.85. Based on Defendant's representations, C.A. believed that these were actual medical receivables and that they were purchased through G.S. All of the debt assignments had G.S.'s name on them. G.S. did not place his name on the documents and did not sell these receivables to C.A. None of the files were legitimate. Three of the false receivable documents had the names of three known adults who did not permit their names to be on the documents. They are T.C, R.D. and A.E.

4. Between October 7, 2015, and October 29, 2015, C.A. purchased 5 medical receivable files. He made five payments to FLSUCO, totaling \$95,303.31. Based on Defendant's representations, C.A. believed that these were actual medical receivables and that they were purchased through G.S. All of the debt assignments had G.S.'s name on them. G.S. did not place his name on the documents and did not sell these receivables to C.A. None of the files were legitimate. Two of the false receivable documents had the names of two known adults who did not permit their names to be on the documents. They are B.D and H.T.

5. Between November 6, 2015, and November 25, 2015, C.A. purchased six medical receivable files. He made five payments to FLSUCO, totaling \$54,000. Based on Defendant's representations, C.A. believed that these were actual medical receivables and that they were purchased through G.S. All of the debt assignments had G.S.'s name on them. G.S. did not place his name on the documents and did not sell these receivables to C.A. None of the files were legitimate. One of the false receivable documents had the names of one known adult who did not permit his name to be on the documents. That adult is C.B.

6. Between December 1, 2015, and December 30, 2015, C.A. purchased eight medical receivable files. He made five payments to FLSUCO, totaling \$67,000. Based on Defendant's representations, C.A. believed that these were actual medical receivables and that they were purchased through G.S. All of the debt assignments had G.S.'s name on them. G.S. did not place his name on the documents and did not sell these receivables to C.A. None of the files were legitimate.

7. Between January 5, 2016, and February 23, 2016, C.A. purchased seven medical receivable files. He made five payments to FLSUCO, totaling \$47,807. Based on Defendant's representations, C.A. believed that these were actual medical receivables and that they were purchased through G.S. All of the debt assignments had G.S.'s name on them. G.S. did not place his name on the documents and did not sell these receivables to C.A. None of the files were legitimate. One of the false receivable documents had the name of one known adult who did not permit her name to be on the documents. That adult is L.O.

Complainant reports that he and other Minnesota Department of Commerce Fraud Bureau executed a search warrant at Defendant's home located at 929 Portland Avenue South, Minneapolis, on June 30, 2016. Agents found the FLSUCO checkbook and some fraudulent medical receivables. Complainant and Special Agent Steven Kritzeck interviewed Defendant on the same date. In a voluntary Miranda-prefaced statement, Defendant admitted that he had orchestrated a scheme to steal money from C.A. by posing as G.S. He further admitted that he had had two friends open bank accounts for FLSUCO and that he had used the friends' names to register FLSUCO with the Minnesota Secretary of State. Defendant also stated that he had created email accounts and a Facebook account in order to make C.A. believe he was communicating with G.S. He admitted that he created the fraudulent medical receivables.

Complainant respectfully requests a warrant as Defendant has connections within the State of Florida and may currently reside there. Complainant does not know Defendant's current whereabouts.

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

Markham L Stock
Supervisory Special Agent
85 7th Place East
Suite 100
St. Paul, MN 55101
Badge: 112

Electronically Signed:
01/10/2019 02:41 PM
Ramsy County, MN

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

Prosecuting Attorney

Diane Krenz
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
01/10/2019 02:09 PM

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 on _____, _____ at _____ AM/PM before the above-named court at 300 S Sixth Street, Minneapolis, MN 55487 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: \$1,000,000.00

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 10, 2019.

Judicial Officer

Tamara Garcia
District Court Judge

Electronically Signed: 01/10/2019 02:54 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.

JEREMY KEE ANDERSON

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Warrant
upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: JEREMY KEE ANDERSON
DOB: 01/25/1971
Address: 929 PORTLAND AVENUE
#2701
Minneapolis, MN 55441

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: Asian

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

SILS Person ID #: 801575

SILS Tracking No. 3077143

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	7/20/2015	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1731	N	MN062095Y	16000643
	Modifier	7/20/2015	609.527.7 Identity Theft - Aggregation and Prosecution in One County	No-Level	U1731	N	MN062095Y	16000643
	Penalty	7/20/2015	609.527.3(5) Identity Theft-Eight or More Direct Victims/Combined Loss Greater Than \$35,000 or Child Porn Related	Felony	U1731	N	MN062095Y	16000643
2	Charge	9/2/2015	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1731	N	MN062095Y	16000643
	Modifier	9/2/2015	609.527.7 Identity Theft - Aggregation and Prosecution in One County	No-Level	U1731	N	MN062095Y	16000643
	Penalty	9/2/2015	609.527.3(5) Identity Theft-Eight or More Direct Victims/Combined Loss Greater Than \$35,000 or Child Porn Related	Felony	U1731	N	MN062095Y	16000643
3	Charge	9/18/2015	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1731	N	MN062095Y	16000643
	Modifier	9/18/2015	609.527.7 Identity Theft - Aggregation and Prosecution in One County	No-Level	U1731	N	MN062095Y	16000643
	Penalty	9/18/2015	609.527.3(5) Identity Theft-Eight or More Direct Victims/Combined Loss Greater Than \$35,000 or Child Porn Related	Felony	U1731	N	MN062095Y	16000643
4	Charge	10/7/2015	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1731	N	MN062095Y	16000643
	Modifier	10/7/2015	609.527.7 Identity Theft - Aggregation and Prosecution in One County	No-Level	U1731	N	MN062095Y	16000643
	Penalty	10/7/2015	609.527.3(5) Identity Theft-Eight or More Direct Victims/Combined Loss Greater Than \$35,000 or Child Porn Related	Felony	U1731	N	MN062095Y	16000643
5	Charge	11/6/2016	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1731	N	MN062095Y	16000643
	Modifier	11/6/2016	609.527.7 Identity Theft - Aggregation and Prosecution in One County	No-Level	U1731	N	MN062095Y	16000643
	Penalty	11/6/2016	609.527.3(5) Identity Theft-Eight or More Direct Victims/Combined Loss Greater Than \$35,000 or Child Porn Related	Felony	U1731	N	MN062095Y	16000643
6	Charge	12/1/2015	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1731	N	MN062095Y	16000643
	Modifier	12/1/2015	609.527.7 Identity Theft - Aggregation and	No-Level	U1731	N	MN062095Y	16000643

Prosecution in One County							
Penalty	12/1/2015	609.527.3(5) Identity Theft-Eight or More Direct Victims/Combined Loss Greater Than \$35,000 or Child Porn Related	Felony	U1731	N	MN062095Y	16000643
7 Charge	1/5/2016	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1731	N	MN062095Y	16000643
Modifier	1/5/2016	609.527.7 Identity Theft - Aggregation and Prosecution in One County	No-Level	U1731	N	MN062095Y	16000643
Penalty	1/5/2016	609.527.3(5) Identity Theft-Eight or More Direct Victims/Combined Loss Greater Than \$35,000 or Child Porn Related	Felony	U1731	N	MN062095Y	16000643