

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Case Type: Criminal

State of Minnesota,

Court File No. _____

Plaintiff,

vs.

Abdirashid Ismail Said, and
Said Awil Ibrahim,

Defendants.

**DECLARATION OF KAILEE POTOCHNIK
IN SUPPORT OF REQUEST TO FILE
COMPLAINTS UNDER SEAL
PURSUANT TO MINN. R. CRIM. P.
33.04(c)**

I, KAILEE POTOCHNIK, declare under penalty of perjury:

1. I am a Senior Investigator with the Medicaid Fraud Control Unit (“MFCU”) of the Minnesota Attorney General’s Office. As a MFCU Senior Investigator, I investigate allegations of fraud by health care providers enrolled in the Minnesota Medical Assistance (Medicaid) Program.
2. I am the affiant for criminal complaints the MFCU seeks to file under seal charging Abdirashid Ismail Said (“SAID”) and Said Awil Ibrahim (“IBRAHIM”) with racketeering and other offenses related to the theft of Medicaid funds. SAID and IBRAHIM are co-defendants and are charged with conspiring together and with other co-conspirators to defraud the Medicaid program. The testimony I provided in the Statement of Probable Cause for those criminal complaints is true and accurate.
3. The criminal complaints seek a warrant for the arrest of SAID and IBRAHIM because I believe there is a substantial likelihood that SAID and IBRAHIM will fail to respond to a summons.

4. I believe making the attached complaints public may cause the potential for SAID or IBRAHIM to flee, hide, or otherwise prevent the execution of the warrant.

5. Related to SAID, in the course of my investigation, I learned that SAID has significant family ties outside of the United States. Specifically, SAID's wife and child reside in Nairobi, Kenya. SAID is currently on probation in Hennepin County District Court File Number 27-CR-21-11942 and on June 13, 2023 requested permission from the Court to leave the country. The request was denied and SAID made all future Court appearances following the request. Given the nature and severity of the charges, and SAID's familial ties outside the jurisdiction of Minnesota, I believe there is a potential SAID may flee, hide, or otherwise prevent the execution of the warrant.

6. Related to IBRAHIM, in the course of my investigation, I learned that IBRAHIM has recently traveled outside of the United States. Specifically, IBRAHIM was out of the country in November of 2022, January 2023 and April 2023. In the course of my investigation I uncovered evidence that suggests IBRAHIM may flee, hide, or otherwise prevent execution of a warrant. Specifically, search warrant evidence uncovered from SAID's phone revealed a text exchange between SAID and IBRAHIM. In the exchange, IBRAHIM states, in relevant part: "Im gonna over bill the hours [a]nd do a hit and run [s]o I can leave [the Awil] family behind[.]" Given the nature and severity of the charges, IBRAHIM's recent travel outside of the United States, and IBRAHIM's text exchange with SAID, I believe there is a potential that IBRAHIM may flee, hide, or otherwise prevent the execution of the warrant.

FURTHER YOUR DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that everything I have stated in this document is true and correct.
Minn. Stat. § 358.116.

Dated: December 5, 2023
RAMSEY COUNTY, MINNESOTA

/s/ Kailee Potocnik
KAILEE POTOCHNIK

#5652355-v1



MINNESOTA
JUDICIAL
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