

October 9, 2025

**CERTIFIED MAIL**

Moktar Aden, Authorized Agent  
Brilliant Minds Services L.L.C.  
729 Allen Avenue  
Little Canada, MN 55117-1277

License Application Number 1115487 (245D - HCBS)

## **ORDER OF LICENSE DENIAL**

Dear Moktar Aden:

The Department of Human Services (DHS) is denying your application for a Home and Community-Based Services (HCBS) license at 215 Kipling Street, St. Paul, Minnesota. This denial is based on controlling individuals being the subjects of pending administrative and criminal investigations. Details of our findings are provided below. Our next steps and your options are also detailed.

### **REASON FOR LICENSE DENIAL**

#### **1. Subjects of pending administrative and criminal investigations**

CI1, CI2, CI3, and CI4 were identified as controlling individuals on your application. On September 17, 2025, CI1, CI2, CI3, and CI4 were criminally charged with wire fraud in United States District Court District of Minnesota through Court File Number 25-cr-00349 (MJD/JFD). The criminal complaint alleges that CI1, CI2, CI3, and CI4 defrauded federally funded health care benefits that were administered by DHS. Additionally, CI1, CI2, CI3, and CI4 are the subject of a pending DHS administrative investigation.

Legal Authority: Minnesota Statutes, section 245A.05, subdivision (a)(11).

#### **2. Commissioner's evaluation of program**

In determining whether a licensing action is warranted, DHS evaluated the facts, conditions, and circumstances concerning your program's operation. This includes consideration of the program's operation, the well-being of children and persons served by your program, available evaluations of the program by persons receiving services, information about the qualifications of staff persons that are working in your program, and the applicant's ability to demonstrate competent knowledge of the applicable requirements of statutes and rules. Based on the pending criminal investigations, DHS does not have faith that you are able to operate a license that would comply with applicable statutes and

rules. In addition, DHS cannot ensure that public funds that would be received by your program will be obtained in compliance with relevant statutes and rules and that persons served by the program would receive the care to which they are entitled. DHS has determined that the denial of your license is appropriate based on the violation identified above.

Legal Authority: Minnesota Statutes, section 245A.04, subdivision 6.

**Due to the serious and chronic nature of these violations, which impact the health and safety of children and persons served in your care, your license to provide home and community-based services is denied.**

## **YOUR RIGHT TO APPEAL**

You have the right to appeal the denial. Your request must be in writing and clearly state that you are requesting a contested case hearing for this matter. Your request must be made before the deadlines provided below. If you do not meet this deadline, you lose your right to an administrative appeal. The timeline to appeal began when you received this order.

If you are mailing your request, it must be sent by certified mail and postmarked within 20 calendar days from when you received this order. Please send it to:

Commissioner, Department of Human Services  
Office of Inspector General  
Legal Counsel's Office  
Attention: Licensing Legal Unit  
PO Box 64953  
St. Paul, MN 55164-0953

If your request is being personally delivered, it must be received by DHS within 20 calendar days from when you received this order. Please bring it to:

Commissioner, Department of Human Services  
Office of Inspector General  
Legal Counsel's Office  
Attention: Licensing Legal Unit  
444 Lafayette Road North  
St. Paul, MN 55155

Upon DHS' receipt of your timely appeal, your case would be scheduled for a contested case hearing in front of an Administrative Law Judge. Following this hearing, the Commissioner of DHS will issue a final order. If you do not appeal or if the order is affirmed by the Commissioner following a hearing, DHS is prohibited from issuing you and the controlling individuals a license for two years.

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### **Legal representation at the contested case hearing:**

You do not need a lawyer to appeal. However, a lawyer can help you with your appeal. The state or county will not get you a lawyer and will not pay for a lawyer. If you cannot afford a lawyer, you may be able to get free legal advice or help with your appeal. To find out if free help is available, contact: Volunteer Lawyers Network at 612-752-6677; Central Minnesota Legal Services at 612-332-8151; Southern Minnesota Legal Services at 651-222-4731; or go to [www.lawhelpmn.org](http://www.lawhelpmn.org) to find a local legal services program that may be able to help you.

You can also find information on contested cases from the Office of Administrative Hearings website at <https://mn.gov/oah/self-help>. Click on Administrative Law Overview, then click on Administrative Law Contested Case Hearing Guide for a list of frequently asked questions.

### **Legal authority for this licensing action**

- This action is taken under Minnesota Statutes, section 245A.05, subdivision (a), which describes under which conditions DHS may revoke a license.
- "Controlling individual" is defined under Minnesota Statutes, section 245A.02, subdivision 5a.
- License holders have a right to appeal licensing actions and request a contested case hearing, under Minnesota Statutes, chapter 14 and Minnesota Rules, parts 1400.8505 to 1400.8612.
- Under Minnesota Statutes, section 245A.04, subdivision 7, paragraph (d), clause (2), the commissioner shall not issue or reissue a license if the applicant, license holder, or controlling individual has been denied a license under this chapter within the past two years.

### **Questions**

If you have any further questions regarding this matter, you may contact Brittany Raddatz, Supervisor, at 651-431-6591.

Sincerely,



Christala Culhane, HCBS Unit Manager  
Licensing Division  
Office of Inspector General