



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

November 18, 2025

Tracey Hamlet
MOKA Non-Profit Services Corp
Suite 201
715 Terrace St.
Muskegon, MI 49440

RE: License #: AS410278077
Investigation #: 2025A0357045
Mullins AFC Home

Dear Ms. Hamlet:

Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- How compliance with each rule will be achieved.
- Who is directly responsible for implementing the corrective action for each violation.
- Specific time frames for each violation as to when the correction will be completed or implemented.
- How continuing compliance will be maintained once compliance is achieved.
- The signature of the responsible party and a date.

If you desire technical assistance in addressing these issues, please contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action.

Please review the enclosed documentation for accuracy and contact me with any questions. In the event that I am not available and you need to speak to someone immediately, please contact the local office at (616) 356-0100.

Sincerely,

Arlene B. Smith

Arlene B. Smith, MSW, Licensing Consultant
Bureau of Community and Health Systems
Unit 13, 7th Floor
350 Ottawa, N.W.
Grand Rapids, MI 49503
(616) 916-4213

enclosure

**MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF COMMUNITY AND HEALTH SYSTEMS
SPECIAL INVESTIGATION REPORT**

I. IDENTIFYING INFORMATION

License #:	AS410278077
Investigation #:	2025A0357045
Complaint Receipt Date:	07/08/2025
Investigation Initiation Date:	07/08/2025
Report Due Date:	09/06/2025
Licensee Name:	MOKA Non-Profit Services Corp
LicenseeAddress:	Suite 201 715 Terrace St. Muskegon, MI 49440
Licensee Telephone #:	(616) 719-4263
Administrator:	Sergejs Toms Zvirgzds
Licensee Designee:	Tracey Hamlet
Name of Facility:	Mullins AFC Home
Facility Address:	1630 Mullins Avenue, NW Grand Rapids, MI 49534-2435
Facility Telephone #:	(616) 735-2327
Original Issuance Date:	09/28/2005
License Status:	REGULAR
Effective Date:	03/27/2024
Expiration Date:	03/26/2026
Capacity:	6
Program Type:	DEVELOPMENTALLY DISABLED MENTALLY ILL

II. ALLEGATION(S)

	Violation Established?
Former Resident A's funds are unaccounted for with missing money and no receipts.	Yes

III. METHODOLOGY

07/08/2025	Special Investigation Intake 2025A0357045
07/08/2025	Contact - Document Sent I sent a referral to network 180, Recipient Rights, Michelle Richardson, Director.
07/08/2025	Contact - Telephone call made To the Administrator, Sergejs Toms Zvigsds.
07/08/2025	Special Investigation Initiated - Telephone To the Administrator Sergejs Toms Zvigsds.
07/19/2025	Contact - Telephone call received APS left message that they were investigating. I called back and left a message.
10/03/2025	Inspection Completed On-site Met with Home Supervisor Jennifer Bayle
11/14/2025	Contact telephone call made to Andrew Onyaiti, the former Home Supervisor.
11/18/2025	A telephone exit conference was provided to the Licensee Designee, Tracey Hamlet.

ALLEGATION: Former Resident A's funds are unaccounted for with missing money and no receipts.

INVESTIGATION: Originally Adult Protective Services denied investigating the complaint but then they opened an investigation. Therefore, no referral was made to APS.

On 07/07/2025, I received an anonymous complaint that some of Resident A's monies were missing. The complaint stated that Resident A is deceased. She had

an intellectual disability. It was alleged that some of her money that MOKA had in the bank account for Resident A is not accounted for. Either there had been purchases made over a period, or the money was taken. There are no receipts, but it is unknown where the money went. Her spending money at the AFC home was available to her at any time. Some of her monies in the bank account were missing.

On 07/08/2025, I spoke by telephone with Sergejs Toms Zvirgzds, the administrator and the Regional Director, for MOKA south. He stated that he had notified the Walker Police Department of the missing monies, and he called Resident A's guardian. He explained they had completed a financial audit, and the missing money was not noticed. He stated that a second audit was conducted, and they found that Resident A's bank account had missing money. He explained that her money in the home recorded on Resident Funds Part II was audited and there was no money missing from her account. He stated that it was difficult to monitor. He explained that Andrew Onyaiti was the Home Supervisor, and he had access to Resident A's money in her bank account. He stated it was possible Mr. Onyaiti had poor record keeping or he could not find the receipts. They could not account for Resident A's missing money. He stated further that Ms. Onyaiti had to show his ID to withdraw money from her bank account and he managed her bank account, and he had access to her account over a period of time. He reported that Mr. Onyaiti no longer works for MOKA. He stated that he provided Mr. Onyaiti's name, address and telephone number to the Walker Police Department, but he had not heard anything from them. I asked Mr. Zvirgzds how much money was missing from Resident A's bank account, and he stated \$350.00. He stated that as soon as MOKA was aware of the missing money they reimbursed Resident A's account. He stated that MOKA was the Rep. Payee for Resident A and upon her death on 01/27/2025, they sent her money back to Social Security Administration. I asked him when Mr. Onyaiti left his employment with MOKA and he stated he resigned on 02/11/2025. I asked him if they had found any other residents with missing money from their bank accounts. He stated he understood that the missing money totaled \$1,000. He confirmed Resident B, C and D had money missing from their accounts. He said they did not find any receipts for the missing money for any of the residents. He stated Resident B had \$400.00 missing, Resident C had \$490.00 missing, and Resident D had \$250.00 missing. He stated that MOKA immediately replaced all the missing funds for each resident.

I asked him how they were planning to address the situation. He stated that they were transiting their banking to a different bank which would allow more effective tracking of funds. He stated that their finance office was working on it. He said the Home Supervisors should also be recording all banking transactions including deposits and withdrawals, so those can be clearly tracked. Mr. Sergejs acknowledged that Resident A's money in the bank was missing, along with money missing from Resident B, C and D's bank accounts.

On 10/03/2025, I made an announced inspection of the home. I met with Home Supervisor, Jennifer Bayle. She reported that only three residents had money that

the home holds. She provided me with three Resident Funds Part II forms. We counted the money together and Resident B, C and D's funds matched the amount on the form. Ms. Bayle stated that the accounts used to be in the PNC bank and now it is Choice One Bank. She also showed me all the receipts of each resident's spending. She also reported that her staff are very careful about keeping the receipts and maintaining the residents' accounts. She said they have not had any problems. She had no direct knowledge of how Resident A's money went missing from the bank account.

On 11/14/2025 I reached by telephone, Andrew Onyaiti, the former Home Supervisor. I explained the complaint to him. He stated they did an audit every month with different supervisors. He reported they reviewed the resident's money in the home recorded on the Resident Funds Part II form with deposits and withdrawals which had to have receipts. He stated that each resident had a monthly statement from the bank on each of their accounts. He explained that when a resident had a need that he had been made aware of he was required to ask his supervisor, Stephen Brown, Residential Coordinator if he could make the purchase with the money from the bank account and he said she, Stephen Brown had to approve it. He stated he had to have the receipt for the purchase and when they conducted the monthly audit the bank statement would show the withdrawal. I asked him if he had taken any money from any of the residents' bank accounts without approval and he stated, "No." I asked who else had access to the resident's bank accounts and he said maybe Ms. Brown or other supervisors. I asked him if any of the staff of the home had access to the resident's bank accounts and he said "No." He stated that each month during the audit they always balanced with no questions. He went on to say he left the job abruptly and left everything at the home, including keys, receipts, cards and anything related to money. I asked him if anyone from law enforcement had contacted him and he said "No." He said he had nothing to do with the missing money, and the monthly audits would prove that. He said they balanced each time with the money maintained in the AFC home and with the bank accounts.

On 11/18/2025, I conducted a telephone exit conference with the Licensee Designee, Tracey Hamlet and she agreed with my findings.

APPLICABLE RULE	
R 400. 637	Handling of resident funds and valuables.
	(2) Resident funds or valuables that have been accepted for safekeeping must be treated as a trust obligation.
ANALYSIS:	It was alleged that former Resident A's funds are unaccounted for with missing money and no receipts. During this investigation it was learned that three additional residents had money missing from their bank account. Sergejs Toms Zvirgzds, the administrator, confirmed that

	<p>\$350.00 had been taken out of Resident A's bank account and there were no receipts found to explain a withdrawal. He also confirmed that Resident B had \$400.00 missing, Resident C had \$490.00 missing, and Resident D had \$250.00 missing from their bank account. He confirmed that MOKA replaced the missing money.</p> <p>Resident B, C and D's accounts were reviewed and the amount of money recorded on Resident Funds Part II form matched. There was no missing money.</p> <p>During this investigation it was confirmed by the administrator, Mr. Zvirgzds that four residents had money missing from their bank accounts without any corresponding withdrawal slips or receipts. Therefore, the trust obligation was violated.</p>
CONCLUSION:	VIOLATION ESTABLISHED

IV. RECOMMENDATION

I recommend the Licensee provide an acceptable plan of correction and the license remain the same.

Arlene B. Smith

11/18/2025

Arlene B. Smith
Licensing Consultant

Date

Approved By:

Jerry Hendrick

11/18/2025

Jerry Hendrick
Area Manager

Date