

GRETCHEN WHITMER GOVERNOR STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS LANSING

ORLENE HAWKS DIRECTOR

November 8, 2019

Abdelbaset Youssef 5873 Springwater Ln West Bloomfield, MI 48322

> RE: Application #: AF630398028 Paradise Home 5873 Springwater Ln West Bloomfield, MI 48322

Dear Mr. Youssef:

Attached is the Original Licensing Study Report for the above referenced facility. The study has determined substantial violations of applicable licensing statutes and administrative rules. Therefore, denial of issuance of a license is recommended. You will be notified in writing of the Agency's intention and your options for resolution of this matter.

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 (248) 975-5053.

Sincerely,

K. Creu

Kenyatta Lewis, Licensing Consultant Bureau of Community and Health Systems 4th Floor, Suite 4B 51111 Woodward Avenue Pontiac, MI 48342 (248) 296-2078

enclosure

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF COMMUNITY AND HEALTH SYSTEMS LICENSING STUDY REPORT

I. IDENTIFYING INFORMATION

License #:	AF630398028
Applicant Name:	Abdelbaset Youssef
Applicant Address:	5873 Springwater Ln West Bloomfield, MI 48322
Applicant Telephone #:	(313) 645-6416
Administrator/Licensee Designee:	N/A
Name of Facility:	Paradise Home
Facility Address:	5873 Springwater Ln West Bloomfield, MI 48322
Facility Telephone #:	(313) 645-6416
Application Date:	01/18/2019
Capacity:	6
Program Type:	PHYSICALLY HANDICAPPED DEVELOPMENTALLY DISABLED MENTALLY ILL ALZHEIMERS AGED TRAUMATICALLY BRAIN INJURED

II. METHODOLOGY

01/18/2019	Enrollment App submitted online 1/13/19 did not download.	
01/18/2019	PSOR on Address Completed NO	
01/18/2019	Inspection Report Requested - Health Invoice No : 1029038	
01/18/2019	Contact - Document Sent Rules and Acts book	
01/18/2019	Application Incomplete Letter Sent RI-030 and FP for Abdelbaset	
02/06/2019	Contact - Document Received RI-030 and FP for Abdelbaset.	
02/06/2019	File Transferred To Field Office Pontiac	
02/11/2019	Contact - Document Received Licensing file received from Central office	
02/20/2019	Inspection Completed-Env. Health: A	
02/20/2019	Inspection Completed-Env. Health: A	
03/06/2019	Application Incomplete Letter Sent	
03/26/2019	Contact - Document Received Received documents from Mr. Youssef	
05/21/2019	Application Incomplete Letter Sent	
05/24/2019	Contact - Document Received Email from applicant asking for temporary license despite physical plant rule violations	
05/24/2019	Inspection Completed On-site	
06/11/2019	Contact - Document Received Email from applicant	
06/17/2019	Contact - Document Received Mail received from applicant	

- 06/18/2019 Contact Document Received Email from applicant
- 06/23/2019 Contact Document Received Email from applicant
- 07/01/2019 Contact Document Received Email from applicant
- 07/02/2019 Contact Document Sent Email to applicant
- 07/03/2019 Contact Document Received Email from applicant asking for temporary license despite rule violations.
- 07/22/2019 Inspection Completed On-site
- 07/23/2019 Contact Document Received Email from applicant
- 07/24/2019 Contact- Telephone Call Received Spoke to concerned citizen
- 07/25/2019 Comment- Internet search completed regarding applicants suspended medical license. LARA license lookup completed regarding applicant's medical license. Online search regarding Springwater Haven completed.
- 07/25/2019 Contact- Telephone Call Made Spoke to applicant- requested picture of license to verify address via text. Inquired about applicant's retirement, and loss of his medical license.
- 07/26/2019 Contact Document Received Text message from applicant
- 07/29/2019 Contact Document Sent Email to Candace Pilarski regarding SOS check for applicant

07/30/2019 Exit conference Conducted with applicant via telephone.

08/02/2019 Contact - Document Received Email from applicant

08/02/2019	Contact - Document Sent Email to applicant
08/09/2019	Contact - Document Received Email from applicant
08/26/2019	Online complaint received from concerned citizen.
10/11/2019	Contact - Document Sent Records request sent to West Bloomfield Police Department
10/11/2019	Contact - Document Received Fax from West Bloomfield Police Department
10/14/2019	Contact - Document Sent Candace Pilarski, SOS request for responsible person, Taj Elgebaly and Anna Zeelie.

III. DESCRIPTION OF FINDINGS & CONCLUSIONS

A. Physical Description of Facility

Paradise Home is located in a residential area in West Bloomfield, Michigan. Paradise Home, constructed in 1954, is a 2,160 sq. ft. single story structure with an attached garage. There is no basement in the home. The home is owned by Mr. Youssef, Abdelbaset Youssef's sons Ahmad and Amr Youssef. The home has a proposed occupancy of six (6) adult foster care residents. Unlicensed adult foster care has been operating and providing adult foster care services to residents off and on since January 2018.

The community is serviced by private water and public sewage system. Medical, social, educational, religious and shopping resources are located nearby within the surrounding community. Laundry facilities are located on the first floor of the home and includes a gas-dryer with a flexible galvanized metal duct.

The home consists of a family room, dining room, laundry room kitchen, 2 $\frac{1}{2}$ bathrooms and four bedrooms.

The furnace and hot water heater are located in on the main floor with a door that will afford a minimum 1 hour protected enclosure. The facility is equipped with ceiling mounted smoke detectors between the sleeping area, the living room and kitchen. Mr. Youssef is aware that the detectors should be tested and that batteries shall be replaced in accordance with the recommendations of the smoke or heat detection equipment manufacturer per Rule 400.137.

There is a fire extinguisher installed on the main floor of the home.

Resident bedrooms were measured during the on-site inspection and have the following dimensions:

Bedroom #	Room Dimensions	Total Square Footage	Total Resident Beds* One bedroom must be designated for the Licensee *
1	11' 6" x 11' 2"	128.42 square feet	2
2	11' x 16' 2"	177.83 square feet	2
3	12' x 9' 11"	119 square feet	2
*4	unknown	unknown	Licensee

Resident Living Space	Room Dimensions	Total Square
		Footage
Family Room	20' 3" x 13' 7"	275.06 square feet
Kitchen	8' 8" x 9' 3"	80.17 square feet
Dining Room	20' 8" x 11' 7"	239.39 square feet

The kitchen, dining room, and family room areas measure a total of 594.62 square feet of living space. This exceeds the minimum of 35 square feet per resident requirement. Based on the above information, it is concluded that this facility can accommodate **six** (**6**) residents. It is the licensee's responsibility not to exceed the facility's licensed capacity.

During the onsite inspection I observed the home and bedrooms were furnished according to the applicable licensing rules and statutes.

B. Program Description

Mr. Youssef intends to provide 24-hour supervision, protection and personal care to six (6) ambulatory residents, whose diagnosis is mentally ill, developmentally disabled, Alzheimer's, physically handicapped, aged and traumatic brain injured (TBI). The program will care for residents , including residents who require hospice care, balanced meals, medication administration, in-house physician (services billed directly to residents' health insurance), housekeeping, laundry, hygiene, physical and social activities, holiday celebrations, games and religious observances. If required, behavioral intervention and crisis intervention programs will be developed as identified in the assessment plan. These programs shall be implemented only by trained staff, and only with the prior approval of the resident, guardian, or the responsible person.

In addition to the above program elements, it is the intent of Mr. Youssef to utilize local community resources including the public entertainment venues, parks and shopping centers. These resources provide an environment to enhance the quality of life for each resident.

A licensing record clearance request was completed with no LEIN convictions recorded for Mr. Abdelbaset Youssef or the responsible person, Taj Elgebaly, who is Mr. Youssef's wife.

C. Rule/Statutory Violations

MCL 400.703 Definitions: A.

(5) "Adult foster care family home" means a private residence with the approved capacity to receive at least 3 but not more than 6 adults to be provided with foster care. The adult foster care family home licensee must be a member of the household and an occupant of the residence.

Based on the information that I received from Mr. Youssef, a concerned citizen and licensing consultant, Cindy Berry, Mr. Youssef, or his wife, Taj Elgebaly, are not occupants of Paradise Home based on the following:

Mr. Youssef mailed documents to the department on 02/22/19, 03/25/19, 06/17/19 and 06/26/19, with his return address listed as 212 Cherry Lane, Inkster, MI 48141.

Anna Zeelie, AKA Analita Zeelie was documented as the onsite manager at an unlicensed facility Springwater Haven, located at this current address, 5873 Springwater Lane West Bloomfield, MI, reference SIR #2019A0602014, UA630391979. This special investigation was closed after an application was submitted to the department on 03/02/18. The applicant, Shanice Hall, withdrew her application for adult foster care on 01/07/19.

During the onsite inspections on 05/24/19 and 07/22/19, I did not observe any of Mr. Youssef's or the responsible person's belongings at Paradise Home. I observed all of the bedrooms and I did not observe any male clothing or shoes in the bedrooms or the home.

During the onsite inspection on 05/24/19, Mr. Youssef stated that he lived at Paradise Home with his wife, Taj Elgebaly. Ms. Elgebaly was present. I did not communicate with her because she did not appear to speak English. Ms. Elgebaly nodded and waved, when I greeted her. Anna Zeelie was also present during the inspection. Ms. Zeelie was wearing nurse scrubs and identified herself as an employee. I also observed an elderly woman, who had personal belongings in one of the bedrooms. Mr. Youssef stated that the woman was Ms. Zeelie's aunt and she was at work with Ms. Zeelie. The elderly woman was not verbal during the onsite inspection. Ms. Zeelie and Mr. Youssef replied "no" that they were still operating an unlicensed facility. I indicated it was clear that the woman had personal belongings in the home and until a license was granted, they should not operate an unlicensed facility.

On 07/22/19, I conducted a second onsite inspection. The responsible person, Taj Elgebaly was not present. The elderly woman that I observed at the facility in May was not present. Ms. Zeelie was present, along with Mr. Youssef. According to Mr. Youssef, the elderly woman, "moved out."

I received a phone call from a concerned citizen on 07/24/19, who stated that Mr. Youssef did not reside in the home. Anna Zeelie has lived in the home since 2018 and has been operating an unlicensed facility where several people have passed away.

On 07/24/19, I contacted Mr. Youssef, via telephone. Mr. Youssef was asked to forward a picture of his driver's license to verify his address and send the picture to me via his cell phone. Mr. Youssef stated that the camera was broken on his cell phone, but he would ask his son to come to the facility to take a picture of his license.

On 07/25/19, I received a text message from Mr. Youssef with a picture of his driver's license attached. I observed the front of his driver's license. Mr. Youssef's address on his driver's license was listed as 6828 Cathedral Dr. Bloomfield Hills, MI. I also observed the back of Mr. Youssef's driver's license. I observed a white sticker with the address listed as 5873 Springwater Lane West Bloomfield, MI, with the date 07/25/19.

On 07/29/19, I sent an inquiry to Candace Pilarski, Licensing and Regulatory Affairs Adult Foster Care Program Consultant, to verify Mr. Youssef's address, via Secretary of State (SOS). The SOS search verified that Mr. Youssef changed his address on 07/25/19. The applicant, Mr. Youssef changed the address on his driver's license after I asked him to verify his residency at Paradise Home.

I received a letter from Mr. Youssef dated 08/02/19. Mr. Youssef documented that the house (5873 Springwater Lane) was rented out in 2018, but the rent expired. (No date provided). Mr. Youssef did not renew the lease because his home in Bloomfield Hills will be offered for sale. Mr. Youssef documented that he moved to Paradise Home in West Bloomfield, because he was "lazy" to change the address and both homes are his and car insurance is cheaper in Bloomfield. Mr. Youssef also documented that "the elderly woman, at the facility on 05/24/19 is 100 years old and the aunt of the lady who rented the house during 2018. She was like a guest, but she was moved so Ms. Lewis did not see her in the second visit."

There are other documents on file, that list different addresses for Mr. Youssef. For example, I observed a letter that Mr. Youssef wrote me, dated 06/14/19 with a Notice of Assessment for 5873 Springwater Lane, from the Charter Township of West Bloomfield attached. Mr. Youssef's mailing address is listed as 212 Cherry Lane Inkster, MI. I also observed a letter from Mr. Youssef, dated 03/23/19 in which Mr. Youssef documented that he is the owner of Paradise Home. The mortgage is clear and he transferred the title to his children, Amr, Ahmad and Reem, but it is still his home until his death. Mr. Youssef referenced an attached certificate of occupancy. I observed the certificate of occupancy from the Charter Township of West Bloomfield, dated 01/18/17. The owner/occupant is listed as: Abdelbaset Youssef 212 Cherry Lane, Inkster MI.

Mr. Youssef mailed me a copy of his social security benefit statement and a copy of a lease agreement for a property he owns in Florida. The statement was received on 03/26/19. I observed that Mr. Youssef's address is listed as 212 Cherry Lane, Inkster, MI, on his social security benefit statement.

I observed a lease agreement dated 05/01/17, for a home located at 1332 Hancock Bridge Parkway, Florida 339990-5700 (The city was not documented on the lease). The owner of the property is listed as Youssef, Abdelbaset 7424 Franklin Rd. Bloomfield Hills, MI.

On 10/11/19, I observed a West Bloomfield Township police report dated 06/09/19. The police were dispatched to Paradise Home on Sunday 06/09/19 at 9:30 PM for a burning complaint. The reporting person stated that neighbors were having a party and burning something. Mr. Youssef was not documented in the police report. Anna Zeelie was present and listed on the police report, her address is listed as 5873 Springwater Lane, West Bloomfield, MI.

On 10/14/19, I spoke to Candace Pilarski, Licensing and Regulatory Affairs Adult Foster Care Program Consultant, to verify the responsible person, Taj Elgebaly and Anna Zeelie address via SOS. The SOS search verified that Ms. Elgebaly's address is 212 Cherry Lane Inkster, MI. Ms. Elgebaly is Mr. Youssef's spouse. I also observed Ms. Elgebaly's address on Cherry Lane listed on a bsaonline (<u>https://bsaonline.com/Home/WelcomePage</u>) property tax search. The SOS search verified Anna Zeelie's address is 83 S. Edith Street, Pontiac MI. It should be noted that according to SOS Ms. Zeelie, has an expired license.

Mr. Youssef submitted a family home adult foster care application on 01/18/19. Mr. Youssef listed his address as 8573 Springwater Lane, West Bloomfield, MI. Mr. Youssef stated that he transposed the numbers in his address and asked me to correct his address to 5873 Springwater Lane West Bloomfield, MI. Mr. Youssef listed his wife, Taj Elgebaly as the responsible person and household member. Mr. Youssef listed Ms. Elgebaly's address as 212 Cherry Lane, Inkster, MI Mr. Youssef add name submitted the BCAL-3704, medical clearance forms for himself and Taj Elgebaly on 03/26/19 and listed both home addresses as 5873 Springwater Lane West Bloomfield, MI.

VIOLATION ESTABLISHED

MCL 400.713 License required; application; forms; investigation; on-site evaluation; issuance or renewal of license; disclosures; maximum number of persons; stating type of specialized program; issuance of license to specific person at specific location; transferability of license; sale of facility; notice; items of noncompliance; refusal by department to issue or renew license; conditions; unlicensed facility; violation as misdemeanor; penalty; receipt of completed application; issuance of license within certain time period; inspections; report; criminal history and records check; storage of fingerprints in automated fingerprint identification system database; convictions; "completed application" defined.

> (3) Before issuing or renewing a license, the department shall investigate the activities and standards of care of Mr. Youssef and shall make an on-site evaluation of the facility. On-site inspections conducted in response to the application may be conducted without prior notice to Mr. Youssef. On-site inspections conducted for renewing a license may be conducted within 12 months before the expiration date of the current license without impact on the license renewal date or the license fee. Subject to subsections (9), (10), and (11), the department shall issue or renew a license if satisfied as to all of the following:

(b) Mr. Youssef's compliance with this act and rules promulgated under this act.

Based on the information that I received from Mr. Youssef, a concerned citizen, licensing consultant, Cindy Berry, I concluded that Mr. Youssef has been working with Anna Zeelie, AKA Analita Zeelie, operating an unlicensed facility since 2018 at 5873 Springwater Lane West Bloomfield, MI.

Anna Zeelie, AKA Analita Zeelie was documented as the onsite manager at an unlicensed facility Springwater Haven, located at 5873 Springwater Lane West Bloomfield, MI, reference SIR #2019A0602014/UA630391979. The special investigation was closed after an application was submitted to the department on 03/02/18. Mr. Youssef and Shanice Hall, withdrew the application for adult foster care on 01/07/19.

I received a phone call from a concerned citizen on 07/24/19, who stated that Mr. Youssef did not reside in the home. Anna Zeelie has lived in the home since 2018 and has been operating an unlicensed facility where several people have passed away. The concerned citizen stated that Mr. Youssef and Ms. Zeelie work with a hospice program to admit residents and that in the last few months, at least five bodies have been removed from the house. Springwater Haven can be found online as a senior home care facility. The concerned citizen stated that Ms. Zeelie is the front person, so that Mr. Youssef, can illegally treat patients in hospice care. Mr. Youssef lost is medical license for overprescribing narcotics a few years ago. Mr. Youssef and Ms. Zeelie had another woman working to get an adult foster care license with licensing consultant, Cindy Berry. The woman stopped working at the home earlier this year. The concerned citizen stated that Mr. Youssef had been at the home more frequently in the last few months, but he comes and goes each day. There is no other woman living in the facility except for Ms. Zeelie.

On 07/24/19, I spoke to Mr. Youssef via telephone. I asked Mr. Youssef if he was using Paradise Home to treat Hospice patients using his sons, who are licensed physicians, to prescribe medications on his behalf, since his medical license was suspended. Mr. Youssef denied operating a hospice.

On 07/25/19, I conducted a google search for Springwater Haven. I located an active website: <u>https://www.springwaterhaven.com.</u> The website copyright year is 2017. The contact email listed on the website is <u>annzeelie76@gmail.com</u>. The following statement is listed on the website: *At Springwater Haven, we provide 24/7 senior care in a safe environment where our patients can feel like home. Also, we take pride in our commitment to our residents and their families. The place we call home is the place that feels most comfortable, familiar, and secure. A sense of home can become very important as we age and grow older which may bring with it discomfort or feeling unsafe. Our in-home senior care services help ease the challenges of growing older as we encourage seniors to continue enjoying the comforts of home. 24/7 Home Care*

~Accepts ALL kinds of Medical Conditions ~Alzheimer's & Dementia Care ~Medication Management ~Day Care And Hospice ~Hygiene Care: Bathing, Grooming, Toileting, etc. ~Wheelchair Accessible

On 07/25/19, I conducted a google search for Mr. Youssef. I observed the following article: KIRKUS REVIEW (2018, January 29.) The Legal Felony I noted that Mr. Youssef wrote a book to lament about his suspended medical license. In 2015, the Michigan Board of Medicine suspended the license of Mr. Youssef, after he allegedly prescribed over 25,000 controlled substances in a year. Mr. Youssef's suitability as a provider for vulnerable adults is questionable. Mr. Youssef has not been successful in renewing his medical license, due to his failure to comply with the directives of the Michigan Board of Medicine. I also observed the State of Michigan, Department of Licensing and Regulatory Affairs Bureau of Health Care Services, Board of Medicine, Disciplinary Committee, Administrative Complaint in the matter of Abdelbaset A. Youssef, M.D. License Number:43-01-081069 File No. 43-12-12666 dated 09/18/14.

I noted some of the facts and allegations, documented on pages 3- 4. Mr. Youssef prescribed 25,475 controlled substances between 08/01/12 - 07/13/13. In August 2013, Mr. Youssef indicated that he saw patients 5 days per week. Therefore, he prescribed an average of 102 prescriptions per day between 08/01/12 – 07/13/13. Mr. Youssef's charts for patients receiving controlled substances were reviewed. Mr. Youssef's charting showed a failure to follow the applicable standards of practice. I also observed State of Michigan, Department of Licensing and Regulatory Affairs Bureau of Health Care Services, Board of Medicine, Disciplinary Committee, Final Order, in the matter of Abdelbaset A. Youssef, M.D. License Number:43-01-081069 Final No. 43-12-12666 dated 10/30/15.

I noted that an administrative hearing was held on 06/18/15. The disciplinary subcommittee of the Michigan Board of Medicine accepted the findings and ordered that Mr. Youssef's license to practice medicine was suspended for a minimum of six months and one day. It was further ordered that Mr. Youssef was fined \$20,000.

I also observed State of Michigan, Department of Licensing and Regulatory Affairs Bureau of Health Care Services, Board of Medicine, Disciplinary Committee, Final Order Denying Reinstatement, in the matter of Abdelbaset A. Youssef, M.D. License Number:43-01-081069 Final No. 43-16-141601 dated 12/21/16.

I noted that Mr. Youssef filed an application for reinstatement of his medical license on 03/03/16. On 05/23/16, the Department of the Atty. General, Licensing and Regulatory Affairs, Bureau of Professional Licensing filed a response in opposition to Mr. Youssef's application for reinstatement. Mr. Youssef's application for reinstatement to practice medicine was denied, due to Mr. Youssef's failure to satisfy the requirements for reinstatement.

I also observed the State of Michigan, Department of Licensing and Regulatory Affairs Bureau of Health Care Services, Board of Medicine, Disciplinary Committee, Final Order Denying Reinstatement, in the matter of Abdelbaset A. Youssef, M.D. License Number:43-01-081069 Final No. 43-18-149479 dated 01/16/19 I noted that Mr. Youssef filed an application for reinstatement of his medical license on 01/29/18. On 02/13/18, the Department of Licensing and Regulatory Affairs Bureau of Professional Licensing filed a response in opposition to Mr. Youssef's application for reinstatement. Mr. Youssef's application for reinstatement to practice medicine was denied, due to Mr. Youssef's failure to satisfy the requirements for reinstatement. During the course of the licensing process, Mr. Youssef stated that he was a retired physician and did not mention that his medical license was suspended. In a letter from Mr. Youssef dated 03/23/19, Mr. Youssef documented, "I am a retired physician." In a letter from Mr. Youssef, dated 08/02/19, Mr. Youssef documented, that his medical license was suspended due to a personal conflict with the Assistant Attorney General Andrew Hudson, and retaliation from Administrative Law Judge, Hon. Eric Williams and the board, due to the publishing of his book, "The Legal Felony."

On 07/25/19, I spoke to Mr. Youssef via telephone regarding if he was using Paradise Home to treat Hospice patients using his sons, who are licensed physicians, to prescribe medications on his behalf, since his medical license was suspended. Mr. Youssef denied operating a hospice.

On 08/26/19, an online complaint was received by a concerned citizen. The allegations were that Mr. Youssef and his sons Dr. Ahmad Youssef, Amr Youssef and Reem Youssef were operating an unlicensed facility with Anna Zeelie who has resided in the home since 2017. Dr. Ahmad Youssef refers and provides care to his own patients at Paradise Home. All of the patients are aged 80 -100 years old and several deaths have occurred.

On 10/11/19, I received and reviewed 43 pages of police reports regarding Paradise Home. The police reports cover incidents that occurred between 01/11/18-06/09/19. I observed nine hospice death incident reports dated between 01/11/18-10/12/18. Anna Zeelie was documented as being present at the time of death on each report. Mr. Youssef was not documented on any of the death incident reports. I also observed a police report dated 06/09/19. The police were dispatched to Paradise Home on Sunday 06/09/19 at 9:30 PM for a burning complaint. The reporting person stated that neighbors were having a party and burning something. Mr. Youssef or respondent were not documented in the police report. Anna Zeelie was present and listed on the police report, her address is listed as 5873 Springwater Lane, West Bloomfield, MI.

VIOLATION ESTABLISHED

R 400.1404 Licensee, responsible person, and member of the household; qualifications.

(3) A licensee or responsible person shall possess all of the following qualifications:

(b) Be suitable to meet the physical, emotional, social, and intellectual needs of each resident.

Based on the information that I received during the course of Mr. Youssef's licensing process, I concluded that the licensee is not suitable to meet the physical, emotional and social needs of vulnerable adults. Mr. Youssef's medical license has been suspended since 2015 due to allegations regarding Mr. Youssef prescribing over 25,000 narcotic medications. Mr. Youssef has failed to get his medical license reinstated.

Mr. Youssef has not been forthcoming and has omitted information regarding his medical license, as well as his and the responsible person's address. I have noted at least four (4) different addresses documented for Mr. Youssef and two (2) addresses for the responsible person who Mr. Youssef stated is his wife and also a household member.

I also concluded that Mr. Youssef has partnered with Anna Zeelie to operate an unlicensed facility, on an off since 2018.

VIOLATION ESTABLISHED

IV. RECOMMENDATION

Based on Mr. Youssef's suitability, I recommend denial of issuance.

K. her

10/17/19

Kenyatta Lewis Licensing Consultant Date

Approved By:

Denie J. Murn

10/23/2019

Denise Y. Nunn Area Manager Date