



March 3, 2026

The Honorable James Comer, Chairman
Committee on Oversight and Government Reform
United States House of Representatives

Dear Chairman Comer,

Recent news reports highlighting the increasing levels of fraudulent activity and misuse of taxpayer dollars across states are an alarming trend, particularly in Minnesota. We applaud your committee's excellent work in uncovering this fraudulent activity, as well as your continued efforts alongside President Trump and his Administration in protecting taxpayer resources.

The America First Policy Institute (AFPI) is a 501(c)(3) non-profit, non-partisan research institute. AFPI exists to advance policies that put the American people first. Our guiding principles are liberty, free enterprise, national greatness, American military superiority, foreign-policy engagement in the American interest, and the primacy of American workers, families, and communities in all we do. The purpose of this letter is to provide you with an outline of new patterns and anomalies in Minnesota detected by AFPI's independent investigation of fraudulent activities. It is our hope that this letter will serve as a helpful resource to enhance the committee's already extensive work to curb this abusive trend.

As you know, untold millions—potentially billions—of dollars in fraudulent federal health and welfare subsidies have recently been uncovered. This fraud has dominated the news cycle, resulting in law-abiding taxpayers becoming well acquainted with scenes of sham businesses across the Twin Cities region. There have been alarming stories of childless day care centers, transportation companies submitting claims for phantom rides, fake autism clinics, and vacant home-care facilities.¹ Many of these schemes have been supported, in salient part, by three programs administered by the U.S. Department of Health and Human Services (HHS) – Temporary Assistance for Needy Families (TANF), the Child Care and Development Fund (CCDF), and non-institutional Medicaid benefits, particularly under Home and Community-Based Services (HCBS) waivers.² Taken together, TANF, CCDF, and HCBS furnish low-income families with income assistance, child care, and reimbursable in-home and community-based care services.

After concluding our own investigation into Minnesota's health and welfare regimes, we believe that the scope and scale of fraud, waste, and abuse in the state exceed what has thus far been uncovered.^{3 4 5} Based on our comprehensive review of these consolidated datasets, AFPI made three key findings.

I. *Residents of the Twin Cities region continue to defraud TANF, CCDF, and Medicaid subsidies. In fact, many residents who are currently indicted for, or directly implicated in, fraud*

¹ See Nick Shirley, *I Investigated Minnesota's Billion Dollar Fraud Scandal*, YouTube (Dec. 26, 2025), <https://www.youtube.com/watch?v=r8AulCA1aOO>.

² 42 U.S.C. §§ 601–619; *id.* § 604(d)(1)(B); 42 U.S.C. § 618; 42 U.S.C. §§ 9857–9858q; 42 U.S.C. §§ 1396d(a), 1396n (respectively).

³ Of note: Per publicly available data, AFPI has reviewed and analyzed publicly available data, spanning 50,000 providers across 90 service categories, plus an additional 20,000 businesses and nonprofits licensed by the state to provide social services, including childcare, employment assistance, and housing stabilization activities supported by TANF and CCDF funds. Additionally, AFPI reviewed publicly reported Minnesota expenditures of HHS funds between fiscal years 21–25.

⁴ See Minn. Dep't of Hum. Servs., *DHS Licensing Information Lookup* (provider licensing database), <https://licensinglookup.dhs.state.mn.us/> (last visited Feb. 17, 2026); see *MHCP Provider Directory*, *supra* note 5.

⁵ See Minn. Mgmt. & Budget, *Minnesota Transparency Portal: Payments Database*, https://transparency.systems.state.mn.us/analytics/saw.dll?Dashboard&PortalPath=%2fshared%2fCitizens%20Portal%2f_portal%2fPayments&Page=Payments%205.1 (last visited Feb. 17, 2026); see also *DHS Licensing Lookup* *supra* note 6; *MHCP Provider Directory*, *supra* note 5.

schemes are enrolled as providers across all three programs. It's highly probable that this extends to primary medical care.

It is highly probable that a substantial number of Minnesota enterprises are, at this very moment, simultaneously defrauding TANF, CCDF, and Medicaid subsidies. Feeding Our Future (FOF) is a nonprofit owned by a Somali immigrant that defrauded more than \$250 million in federal nutrition and Medicaid subsidies.⁶ ⁷ State regulators have allowed spouses of FOF defendants to continue operating Medicaid-certified group homes.⁸ Dozens of other entities at FOF's headquarters have yet to be excluded from the state's Medicaid and [CCDF](#) plans.⁹ Among hundreds of other cases, the licenses held by an individual named Samsam Mohamed are especially concerning. Tendercare, a daycare that purportedly supervises nearly 100 toddlers, remains licensed, despite being next door to an addiction center.¹⁰ The same addiction center, Alliance Wellness, is registered to a mental health network which, until recently, was listed as providing specialized physician care services at multiple homes throughout the Twin Cities.¹¹ Meanwhile, other entities [found guilty](#) of fraud and [reprimanded—albeit leniently—for illegal insurance kickbacks](#) continue to offer non-institutional care, along with acupuncture, chiropractic, dental, and emergency physician benefits.

▶ Samsam Mohamed, Ikram Childcare, FOF—Mohamed is the wife of Gandi Abdi Kediye, an FOF defendant charged with laundering millions of federal nutrition subsidies into real estate.¹² Nevertheless, state regulators have allowed Mohamed's continued operation of at least six Medicaid-certified group homes, including properties into which Kediye may have laundered funds.¹³ Since 2021, Mohamed has received more than \$2.5 million in Medicaid and other federal subsidies.¹⁴

- Mohamed is also a health official for the Hennepin County government.¹⁵
- Nearly 30 Somali-owned businesses holding active licenses for CCDF-sponsored day cares and TANF services are located at FOF's headquarters, including Ikram ChildCare.¹⁶ Several more businesses hold active certifications to service Medicaid beneficiaries.¹⁷

⁶ See, e.g., *supra* note 5; *supra* note 6. (all providers listed at 3055 Old Highway 8, St. Anthony, MN 55418); see also Bill Glahn, *Feeding Our Future: 3055 Old Highway 8 Revisited*, Ctr. of the Am. Experiment (May 29, 2022), <https://www.americanexperiment.org/feeding-our-future-3055-old-highway-8-revisited/>.

⁷ Press Release, Internal Revenue Serv., Criminal Investigation, Minneapolis Woman Pleads Guilty in \$250 Million Feeding Our Future Fraud Scheme (Feb. 25, 2025), <https://www.irs.gov/compliance/criminal-investigation/minneapolis-woman-pleads-guilty-in-250-million-feeding-our-future-fraud-scheme>.

⁸ Roth et al., *supra* note 2.

⁹ Glahn, *Feeding Our Future*, *supra* note 16; *Provider Requirements — Excluded Provider Lists*, Minn. Dep't of Human Servs.,

https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatesReleased&dDocName=DHS-295094 (last visited Mar. 1, 2026); *MHCP Provider Directory*, *supra* note 16.

¹⁰ *Licensing Lookup Search Results for Tendercare*, Minn. Dep't of Human Servs. (last visited Mar. 1, 2026); *Licensing Lookup Search Results for Alliance Wellness*, Minn. Dep't of Human Servs. (last visited Mar. 1, 2026).

¹¹ *About Us*, Alliance Wellness Ctr., <https://www.alliancewellnesscenter.com/about-us/> (last visited Mar. 1, 2026) (note that AFPI retrieved publicly reported data on February 11, 2026, from the MHCP provider portal. AFPI maintains that, per the State's Medicaid plan, Alliance was specifically registered as a network of gynecology and oncology practices, in addition to substance abuse treatment centers).

¹² Roth et al., *supra* note 2; see also Deena Winter, *Man Indicted in Feeding Our Future Fraud Has Been Paid \$49 Million by DHS Since 2016*, Minn. Reformer (Feb. 16, 2024), <https://minnesotareformer.com/2024/02/16/man-indicted-in-feeding-our-future-fraud-has-been-paid-49-million-by-dhs-since-2016/>.

¹³ See generally *id.*; see also *MHCP Provider Directory*, *supra* note 16.

¹⁴ See *TransparencyMN*, Minn. Mgmt. & Budget, <https://transparency.systems.state.mn.us/analytics/saw.dll?Dashboard> (last visited Mar. 1, 2026) (publicly reported data for certain federal payments made by the State).

¹⁵ Samsam Mohamed, LinkedIn, <https://www.linkedin.com/in/samsam-mohamed-b82a7493/> (last visited Mar. 1, 2026).

¹⁶ See *MHCP Provider Directory*; *Licensing Lookup*, Minn. Dep't of Human Servs., *supra*; Glahn, *supra* note 16 (all providers listed at 3055 Old Highway 8); *License Details for Ikram Child Care LLC*, Minn. Dep't of Human Servs., Licensing Info. Lookup, <https://licensinglookup.dhs.state.mn.us/Details.aspx?l=1053172> (last visited Mar. 1, 2026).

¹⁷ *MHCP Provider Directory*; *Licensing Lookup*, *supra*.

▶ Alliance Wellness and Tendercare Learning Center—Yusuf Shafie is the owner of Alliance Wellness Center, LLC.¹⁸ Alliance is registered under the state’s Medicaid plan to provide substance abuse treatment, particularly to khat addicts.¹⁹ At one of the office buildings where it provides such treatment, Alliance is a co-tenant with Tendercare Learning Center, which is a CCDF-funded childcare facility.²⁰ Tendercare purportedly services 90 children.²¹ Tikki Brown, Minnesota’s chief childcare official, has evidently granted Tendercare considerable immunity.

- From 2022 to 2025, Tendercare was sanctioned 20 times for leaving hazardous objects near infants, among other violations.²² Tendercare remains licensed.²³
- Alliance Wellness, meanwhile, operates 11 other addiction facilities, most of which are small houses in suburbs across the Twin Cities.²⁴ The state’s Medicaid plan, up until two weeks ago, listed several of these houses as gynecology and oncology practices.²⁵

▶ Al-Shifa Dentistry—despite its name and express statements on its own website,²⁶ this business is not certified to provide dental care; instead, according to Minnesota’s state Medicaid plan, Al-Shifa is both an autism center and an emergency physician service provider.²⁷

▶ Action for East African People (AEAP)—registered as an autism center, an emergency physician care provider, and a prosthodontist.²⁸ In 2025, AEAP’s founder, Ayan Abukar, pled guilty to defrauding more than \$5.7 million in federal nutrition benefits.²⁹ Governor Walz, in 2021, had personally awarded Abukar the Outstanding Refugee Award for Entrepreneurship.³⁰ In 2024, Abukar was charged by state prosecutors, but Minnesota Attorney General Ellison personally intervened. A settlement was reached that allowed the organization to continue operating, requiring only that Abukar step down.³¹ AEAP has enjoyed a 900% increase in federal funding during the years it was investigated.³² Abukar spent millions on real estate, including a 37-acre commercial property in Lakeville, and spent hundreds of thousands of dollars to purchase an aircraft in Nairobi, Kenya.

II. ***At least four other HHS grant programs are implicated in Minnesotan fraud schemes.***

Perhaps most concerning, AFPI found both documented and probable instances of fraud across at least four other federal programs administered by HHS. Under Part B of the Ryan White HIV/AIDS Program (RWHAP), the Health Resources and Services Administration (HRSA) provides mandatory block grants to fund, among other things, coverage of care for uninsured and underinsured HIV/AIDS patients.³³ Thus, many primary medical care providers under Medicaid are Ryan White providers by default.³⁴ Consonantly, Refugee Cash Assistance (RCA) reimburses medical services furnished to illegal aliens granted asylum.³⁵ Like Medicaid home-delivered meal benefits, block grants under Title III of the Older Americans Act (OAA)

¹⁸ *Beyond Khat: The Impact of Drugs in the East African Community*, Steve Rummeler Hope Network (Nov. 12, 2021), <https://steverummelerhopenetwork.org/wp-content/uploads/2021/11/RCCMHC-MOST-Yussuf-Shafie-Social-Media.pdf>; *About Us*, *supra* note 25; *MHCP Provider Directory*.

¹⁹ *See generally id.*

²⁰ *Licensing Lookup*, *supra* note 24.

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ *MHCP Directory*; *see also* note 25.

²⁵ *Id.*

²⁶ Al-Shifa Dentistry, <https://www.al-shifadentistry.com/> (last visited Feb. 17, 2026).

²⁷ *MHCP Provider Directory*, *supra* note 5; *Winter*, *supra* note 13; *State v. Action for E. Afr. People*, *supra* note 13.

²⁸ *Winter*, *supra* note 13; *State v. Action for E. Afr. People*, *supra* note 13.

²⁹ U.S. Att’y’s Off., Dist. of Minn., *Savage Woman Pleads Guilty for Her Role in \$250 Million Feeding Our Future Fraud Scheme*, (Nov. 15, 2023), <https://www.justice.gov/usao-mn/pr/savage-woman-pleads-guilty-her-role-250-million-feeding-our-future-fraud-scheme>.

³⁰ Press Release, Minn. Dep’t of Human Servs., *Refugees’ Contributions Strengthen Minnesota* (July 19, 2021), <https://content.govdelivery.com/accounts/MNDHS/bulletins/2e86827>.

³¹ *Winter*, *supra* note 13; *State v. AFEAP*, *supra* note 13.

³² *Minnesota Transparency Payment Portal*, *supra* note 7.

³³ 42 U.S.C. § 300ff-21 *et seq.*

³⁴ *See MHCP Provider Directory*, *supra* note 16.

³⁵ 8 U.S.C. § 1522; *see also* 45 C.F.R. §§ 400.90–400.100.

include funding for the Meals on Wheels program for seniors.³⁶ And under the Community Mental Health Services Block Grant (MHBG) and Substance Use Prevention, Treatment, and Recovery Services Block Grant (SUBG) programs (collectively MHBGSUBG), states may use funds to support group homes, housing stabilization, and childcare services for individuals with severe mental health and addiction disorders.³⁷

▶ The Ka Joog organization, Alliance Wellness, received at least \$850,975 in MHBGSUBG and Medicaid funds between FY21-FY25.³⁸ Well over \$600,000 of that amount was administered after Ka Joog's board chair, Ali Elmi, was charged with defrauding millions of dollars in Medicaid subsidies.³⁹ Under the state's "East African Culturally Specific and Appropriate Opioid Services" carveout, at least \$760,000 was awarded to Ka Joog and Alliance Wellness.⁴⁰

In addition to RWHAP and MHBGSUBG, AFPI found that the foregoing businesses are eligible for, have received, or are likely to have obtained funding under the following additional HHS grant programs: Title III of the Older Americans Act (OAA); Title IX Family Planning Grants; Title V Maternal and Children's Health Block Grants (MCHBG); and the Social Services Block Grant (SSBG).⁴¹

III. **Political Carve Outs and Other Findings**

The Walz Administration has shoehorned certain initiatives and carve outs under virtually all state-run programs supported by HHS funds.

It is not entirely surprising that the results of these fraud investigations indicate systemic weaknesses, lack of oversight and accountability, and potential political bias in the distribution of federal funding. For instance, under the state's Title III OAA block grant, Minnesota contracts with halal restaurants and caterers for the provision of "culturally specific meals" to seniors.⁴² Minnesota also gave federal funds to "cultural navigators" to expand Title III services to certain political communities.⁴³

Moreover, the Walz Administration diverted millions in COVID supplemental MHBGSUBG and other federal mental health program funds toward various Somali and East African initiatives. Couched as an effort to combat the mental health effects of "systemic racism," Minnesota Department of Human Services awarded Somali nonprofits and other organizations more than \$4 million in MHBGSUBG funds to service Somali pregnant women.⁴⁴ Under its "East African Culturally Specific and Appropriate Opioid Services" initiative, Minnesota awarded an additional \$760,000 in MHBGSUBG supplementals to various Somali nonprofits, including the Ka Joog organization.⁴⁵ Pursuant to its "Diverse Media Contractors" program, Minnesota also awarded federal COVID relief funds to self-purported news outlets owned by Somalis and other East Africans. Chief among those awardees was Zehabesha LLC, which appears to be

³⁶ 42 U.S.C. §§ 3021–3030d.

³⁷ 42 U.S.C. § 300x et seq.; *id.* § 300x-21 et seq.

³⁸ *Minnesota Transparency Payment Portal*; Ryan Raiche, *DHS Kept Sending State Money to Minnesota Nonprofit After Board Chair Charged with Fraud*, KSTP (Oct. 6, 2022), <https://kstp.com/kstp-news/top-news/dhs-kept-sending-state-money-to-minnesota-nonprofit-after-board-chair-charged-with-fraud/>; **Minn. Dep't of Hum. Servs.**, *Substance Abuse Prevention and Treatment Block Grant COVID Response and Relief Supplemental Appropriations Act Funding Plan, 12 (2021)* https://mn.gov/dhs/assets/sa-prevention-treatment-bg-funds-cr-rsaa_tcm1053-508028.pdf.

³⁹ Raiche, *supra* note 25; *Minnesota Transparency Portal*.

⁴⁰ Minn. Dep't of Hum. Servs., Behavioral Health Div., *Substance Abuse Prevention and Treatment Block Grant COVID-19 Supplement Relief Funding Proposal Plan 12–13* (Oct. 15, 2021), https://mn.gov/dhs/assets/sa-prevention-treatment-bg-funds-cr-rsaa_tcm1053-508028.pdf; see also Minn. Campaign Fin. & Pub. Disclosure Bd., *Lobbying Organization Report: Organization ID No. 7003*, *supra* note 39.

⁴¹ 42 U.S.C. §§ 3021–3030d; 42 U.S.C. §§ 300–300a-8; 42 U.S.C. §§ 701–713; 42 U.S.C. §§ 1397–1397f.3

⁴² Minn. Bd. on Aging, *FFY 2024–2027 State Plan on Aging, Amendment 1*, at 20 (2024), https://mn.gov/board-on-aging/assets/FFY2024-2027%20State%20Plan%20on%20Aging_Amendment_1_accessible_tcm1141-703357.pdf.

⁴³ *Id.* at 80.

⁴⁴ Minn. Dep't of Hum. Servs., Behavioral Health Div., *Substance Abuse Prevention and Treatment Block Grant American Rescue Plan Act Funding Plan 7* (2021), https://mn.gov/dhs/assets/sa-prevention-treatment-bg-funds-arpa_tcm1053-508027.pdf.

⁴⁵ Minn. Dep't of Hum. Servs., *Substance Abuse Prevention and Treatment Block Grant COVID-19 Supplement Relief Funding Proposal Plan*, *supra* note 23, at 12.

nothing more than an Ethiopian man who posts Amharic content to a Facebook page and TikTok account.⁴⁶

And while one can only speculate as to why the Walz Administration used federal tax dollars for such purposes, it is important to note that the Somali community has made significant efforts to lobby nearly all levels of Minnesota's government. Between 2015 and 2023, the Ka Joog organization spent approximately \$89,500 on advocacy at the Minnesota Legislature and elsewhere.⁴⁷ These efforts, more to the point, took place over the pendency of criminal investigations and, as is especially relevant here, at the exact same time Attorney General Ellison intervened and withdrew charges.⁴⁸ In fact, organizations like Ka Joog appear to have hired seasoned veterans to lobby for their causes. Shepard Harrison, a prominent St. Paul-based lobbyist and accomplished left-wing operative, appears to have helped Ka Joog and other Somali organizations secure more than \$1 million from the state.⁴⁹

IV. Conclusion and Recommendations

Considering the foregoing, AFPI draws a simple conclusion: Minnesota's health and welfare systems are irredeemably compromised by fraud, waste, and abuse. Moreover, there are troubling patterns that suggest the Walz Administration may have been involved in rampant misappropriation of American tax dollars with links to other states.

If our findings demonstrate anything, it is that Minnesota is merely a case study revealing the inherent flaws in our federal health and welfare programs. Indeed, the statutory design of various grant programs and safety nets, paired with the lack of authority for the Trump Administration to ensure program integrity, gives us every reason to believe the same levels of fraud, waste, and abuse are actively occurring in every state.

Accordingly, AFPI recommends Congress take the following actions:

- Expand its oversight and the scope of extant investigations to review and probe all categories of providers under federal insurance programs administered by Minnesota's and other states' entitlement programs offices.
- Review the degree and extent of fraud exposure for all HHS block grants and waiver programs, both discretionary and mandatory.
- Build on the landmark accountability and risk-sharing reforms under the Working Families Tax Cuts for programs like Medicaid and SNAP and apply to all federal grant programs.
- Add resources for more forensic enforcement to ensure responsible stewardship of all taxpayer resources.

We thank you for your work on these critical issues and for all that you are doing to ensure that the American taxpayer always comes first.

Sincerely,

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Matthew Henderson
Chief of Government, America First Policy Institute

⁴⁶ Zehabesha, Facebook, <https://www.facebook.com/Zehabesha/following> (last visited Feb. 17, 2026).

⁴⁷ **Minn. Campaign Fin. & Pub. Disclosure Bd.**, *Lobbying Organization Report: Organization ID No. 7003 (2024)*, <https://cfb.mn.gov/reports-and-data/viewers/lobbying/lobbying-organizations/7003/2024.2/>.

⁴⁸ Supra note 23.

⁴⁹ *Shepard M. Harris*, Fredrikson Gov't Relations, LLC, <https://www.fredgov.com/professionals-shepard-harris> (last visited Feb. 18, 2026).