

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Other Civil

State of Minnesota, by its
Attorney General, Keith Ellison,

Court File No. _____

Plaintiff,

vs.

Les Jolies Petites School of Dance d/b/a Les
Jolies Petites School of Dance Gymnastics;

Real Believers Faith Center d/b/a Poppy
Construction R-B-F-C Builders d/b/a RBFC
5000 Men's Ministries d/b/a RBFC Cultivators
Ministries d/b/a Cookhouse Fullgospel
Ministries d/b/a RBFC Lion's Den Africa d/b/a
R.B.F.C. Music Group Real Roudy Righteous
Reloaded Kingdom Kings & Mad Love d/b/a
Power Generation; and

COMPLAINT

Sharon Cook, Larry Cook, Danyale Potts,
Emily Neuhaus, Risheka Remus, Makada
Williams, and Sunsearay Washington,
individually,

Defendants.

The State of Minnesota, by its Attorney General, Keith Ellison, for its Complaint against Les Jolies Petites School of Dance d/b/a Les Jolies Petites School of Dance Gymnastics ("Les Jolies"); Real Believers Faith Center d/b/a Poppy Construction R-B-F-C Builders d/b/a RBFC 5000 Men's Ministries d/b/a RBFC Cultivators Ministries d/b/a Cookhouse Fullgospel Ministries d/b/a RBFC Lion's Den Africa d/b/a R.B.F.C. Music Group Real Roudy Righteous Reloaded Kingdom Kings & Mad Love d/b/a Power Generation ("Real Believers"); and Sharon Cook, Larry

Cook, Danyale Potts, Emily Neuhaus, Risheka Remus, Makada Williams, and Sunsearay Washington, individually, states and alleges as follows:

INTRODUCTION

1. The State of Minnesota, through its Attorney General Keith Ellison (“State” or “AGO”) brings this action to enforce Minnesota’s nonprofit corporation, charitable solicitation, and charitable trust statutes, to seek equitable relief, including repayment of funds Larry Cook, Sharon Cook, Danyale Potts, Risheka Remus, Makada Williams, Emily Neuhaus, and Sunsearay Washington took for personal use from Real Believers and Les Jolies and to obtain other remedies pursuant to the AGO’s role as the primary protector of charitable assets in Minnesota.

2. This Complaint arises from the ongoing violative conduct by Real Believers, Les Jolies, and their officers and directors. Larry and Sharon Cook are the founders and presidents of Real Believers and Les Jolies, respectively. They engaged in the misuse of nonprofit assets and founded for-profit businesses with the same name as nonprofit organizations to create confusion as to where donations were being deposited and for whose benefit. Danyale Potts, Makada Williams, Emily Neuhaus, Risheka Remus, and Sunsearay Washington are directors and officers of Les Jolies and/or Real Believers. They each received a monetary benefit and enabled the rampant misuse of nonprofit assets and the nonprofits’ failure to maintain lawful and adequate governance including maintaining financial documents. The AGO brings this action to put a stop to this pattern of conduct and protect the interests of the public who charitable assets are intended to benefit.

3. This Complaint exposes brazen and systematic abuse in Minnesota’s charitable sector, where nonprofit organizations intended to serve the public good were instead exploited as personal piggy banks by those entrusted to protect them. Over the course of years, Defendants diverted more than \$2 million in charitable assets from Les Jolies and Real Believers to fund lavish

lifestyles, luxury travel, designer goods, and for-profit ventures masquerading under nearly identical names, while pretending to serve their communities. The Defendants concealed their misconduct through sham governance and by creating deliberate confusion between nonprofit and for-profit entities. This pattern of deception and self-dealing strikes at the heart of public trust in charitable organizations.

4. The breadth of wrongdoing is staggering: at least \$2 million in nonprofit assets was siphoned through cash withdrawals, CashApp payments, and pledged as collateral for risky loans that served no charitable purpose. Defendants not only misused charitable funds, but they operated without basic governance safeguards, failed to maintain tax-exempt status, failed to maintain registration with the AGO, and dissolved a nonprofit mid-investigation without the legally required notice to the AGO in an attempt to evade oversight. Their actions reflected their consciousness of their own wrongdoing: all actors asserted the Fifth Amendment in response to nearly every question posed by the AGO; and the Cooks' failed to report their illicit gains to taxing authorities. These acts constitute flagrant violations of Minnesota's nonprofit, charitable solicitation, and charitable trust laws—as well as a betrayal of the communities that the parties were supposed to serve.

PARTIES

1. Keith Ellison, Attorney General of the State of Minnesota, is authorized under Minn. Stat. ch. 8; the Charitable Solicitation Act, Minn. Stat. §§ 309.50–.61; the Minnesota Nonprofit Corporation Act, Minn. Stat. ch. 317A; the Minnesota Supervision of Charitable Trusts and Trustees Act, Minn. Stat. ch. 501B, and common-law authority, including as *parens patriae*, to bring this action to enforce Minnesota's laws, vindicate the state's sovereign and quasi-sovereign interests, and remediate all harm arising out of—and seek relief for—violations of Minnesota law.

2. Les Jolies Petites School of Dance d/b/a Les Jolies Petites School of Dance Gymnastics (“Les Jolies”) was a Minnesota nonprofit corporation incorporated Minn. Stat. ch. 317A. Les Jolies’ registered office address with the Minnesota Secretary of State was 1106 West Broadway Ave., Minneapolis, MN 55411-2506. Les Jolies filed its Articles of Dissolution with the Minnesota Secretary of State on March 25, 2025.¹

3. Real Believers Faith Center d/b/a Poppy Construction R-B-F-C Builders d/b/a RBFC 5000 Men’s Ministries d/b/a RBFC Cultivators Ministries d/b/a Cookhouse Fullgospel Ministries d/b/a RBFC Lion’s Den Africa d/b/a R.B.F.C. Music Group Real Roudy Righteous Reloaded Kingdom Kings & Mad Love d/b/a Power Generation (“Real Believers”) is a Minnesota nonprofit corporation incorporated under Minn. Stat. ch. 317A. Real Believers’ registered office address with the Minnesota Secretary of State is 2010 Fremont Ave. N., Minneapolis, MN 55411-2506.

4. Larry Cook’s last known address is 10255 Yates Drive, Brooklyn Park, MN 55443. Larry Cook is the founder and president of Real Believers and a director of Les Jolies. Larry Cook is the owner of Poppy Construction R-B-F-C Builders, Real Believers Faith Center LLC, and Lions Den Pride Covenant Enterprises LLC, and the registered agent and manager of Lions Den Café.

5. Sharon Cook’s (f/k/a Sharon Potts) last known address is 10255 Yates Drive, Brooklyn Park, MN 55443. Sharon Cook is the founder and president of Les Jolies and a director of Real Believers. Sharon Cook is the owner of LJP Costumes LLC, Real Believers Faith Center LLC, and Lions Den Pride Covenant Enterprises LLC. She is the CEO of Lions Den Café.

¹ As will be discussed in greater detail below, Les Jolies dissolved during the AGO’s investigation unlawfully by failing to provide notice of dissolution to the AGO as required by Minn. Stat. § 317A.811.

6. Danyale Potts' (a/k/a Danyale Potts-Cook, a/k/a Danyale Cook) ("Potts") last known address is 4558 Penn Ave. N., Minneapolis, MN 55412. Potts is a director of Les Jolies and Real Believers.

7. Makada Williams' (f/k/a Makada Cook) ("Williams") last known address is 952 Maryland Ave. E., Saint Paul, MN 55106. Makada Williams is a director and officer of Les Jolies and a director of Real Believers.

8. Sunsearay Washington's (f/k/a Sunsearay Watson) ("Washington") last known address is 5124 Dupont Ave. N., Minneapolis, MN 55430. Washington is a director and officer of Les Jolies and a director of Real Believers.

9. Emily Neuhaus' ("Neuhaus") last known address is 3626 Oakland Ave., Minneapolis, MN 55407. Neuhaus is a director of Les Jolies and a director and officer of Real Believers.

10. Risheka Remus' ("Remus") last known address is 3739 Aldrich Ave. N., Minneapolis, MN 55412. Remus is a director of Les Jolies.

JURISDICTION

11. This Court has subject-matter jurisdiction over this action under Minn. Stat. §§ 8.01, 8.31, 8.32, 309.57, 317A.751, 317A.813, 501B.41 and common law.

12. This Court has personal jurisdiction over Real Believers because it is a Minnesota nonprofit corporation, has its registered office address in Minnesota, has operations in Minnesota, and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

13. This Court has personal jurisdiction over Les Jolies because it was a Minnesota nonprofit corporation, its registered office address is in Minnesota, it operated in Minnesota and

committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

14. This Court has personal jurisdiction over Larry Cook because he has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

15. This Court has personal jurisdiction over Sharon Cook because she has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

16. This Court has personal jurisdiction over Danyale Potts because she has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

17. This Court has personal jurisdiction over Makada Williams because she has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

18. This Court has personal jurisdiction over Emily Neuhaus because she has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

19. This Court has personal jurisdiction over Sunsearay Washington because she has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

20. This Court has personal jurisdiction over Risheka Remus because she has transacted business in Minnesota and has committed acts in Minnesota causing injury in Minnesota to the Minnesota public and in violation of Minnesota law.

VENUE

21. Venue is proper in Ramsey County under Minn. Stat. § 542.09 because one or more of the defendants resides in Ramsey County. Additionally, codefendants previously brought a related action in this venue seeking to obtain a protective order under Minn. Stat. § 8.31, subd. 2 from the AGO's investigation into the facts underlying this complaint (Court File No. 62-CV-25-963).

FACTUAL BACKGROUND

I. LES JOLIES PETITES SCHOOL OF DANCE, REAL BELIEVERS FAITH CENTER, AND THEIR OFFICERS AND DIRECTORS VIOLATED THE MINNESOTA NONPROFIT CORPORATION ACT.

A. Background and Overview.

1. Les Jolies

22. Les Jolies Petites School of Dance ("Les Jolies") was a Minnesota nonprofit organization that was founded by Sharon Cook in 1998.

23. According to the Amendment of Articles of Incorporation filed with the Minnesota Secretary of State in 1998, Les Jolies' "purpose and goal is to operate as a nonprofit [e]ducational organization under Section 501c3 of the internal revenue code." Les Jolies therefore existed solely for charitable purposes under Minnesota Statutes section 501B.35, subdivision 2.

24. Les Jolies received 501(c)(3) tax-exempt status under the Internal Revenue Code ("IRC") in 2015. Les Jolies' tax-exempt status was automatically revoked in 2020 and was never reinstated. Les Jolies' last tax return filed with the IRS is for Tax Year 2016. Les Jolies filed two separate tax returns for Tax Year 2016, one signed by "S. Washington" on May 1, 2017, and the second by Orneary Rogers on December 11, 2017.

25. Les Jolies registered as a soliciting charity with the Minnesota Attorney General's Office ("AGO") on June 14, 1999. Les Jolies filed its last complete annual report for FYE 06 in 2007. Since July 15, 2008, Les Jolies has not been registered as a soliciting charity.

26. Les Jolies' initial registration named three board members, including Sharon Cook.

27. Since 2019, Les Jolies' officers have included: President Sharon Cook, Treasurer Makada Williams, and Treasurer Sunsearay Washington.

28. Since 2019, Les Jolies' directors have included: Sharon Cook, Larry Cook, Risheka Remus, Sunsearay Washington, Danyale Potts, Emily Neuhaus, and Makada Williams.

29. On March 25, 2025, Les Jolies filed dissolution paperwork with the Minnesota Secretary of State, during the AGO's investigation and without providing proper notice to the AGO as required by Minn. Stat. § 317A.811 and as discussed further below.

30. Les Jolies continues to operate a website that states it teaches techniques in various dance genres, contains a class registration link, asks for donations, and explains its fee structure which includes a monthly class fee and enrollment fee.

31. Les Jolies continues to own property at 1106 West Broadway, Minneapolis, MN 55411 ("Dance Studio"), where according to its website it continues to operate a dance studio.

32. Les Jolies' Dance Studio staff include choreographers, administrators, and parent liaisons.

33. Les Jolies does not maintain or keep any documents related to its finances, including expense reports, invoices, balance sheets, and general ledgers.

2. Real Believers

34. Real Believers Faith Center ("Real Believers") is a Minnesota nonprofit corporation that Larry Cook founded in 2002. Larry Cook is also Real Believers' president. Real Believers' website states that it is a church and that it offers a weekly church service and weekly

bible study. Because it exists for religious purposes, Real Believers has a charitable purpose under Minn. Stat. § 501B.35, subd. 2.

35. Real Believers' pastoral team is made up of a number of Les Jolies' directors and officers: Larry and Sharon Cook are co-pastors, Danyale Potts is an executive team pastor, Sunsearay Washington is a management team pastor, and Emily Neuhaus is the director of finance.

36. In December 2022, according to a "Board of Resolution Agreement" ("Resolution Agreement") Real Believers' board of directors had eight people, including: Bishop Larry Cook, Dr. Sharon Cook, Pastor Danyale Potts, Pastor Sunsearay Washington, and Minister Emily Neuhaus. The Resolution Agreement named Bishop Larry Cook as president and Emily Neuhaus as treasurer/director of finance.

37. In January 2023, according to a "Corporate Authorization Resolution," Real Believers named board members and officers, including Larry Cook as a director and president, Emily Neuhaus as director, and Makada Williams as Chief Financial Officer and director.

38. Real Believers owned property at 2010 Fremont Ave. N, Minneapolis, MN 55411 ("Church Building"), which is used as the location for its church. In or around June 2025, Real Believers sold the Church Building to AKY Group LLC. Real Believers then entered into a Contract for Deed with AKY Group LLC for the Church Building.

39. Real Believers owns a house located at 1105 25th Ave. N, Minneapolis, MN 55411 (the "Woods House").

B. Les Jolies, Real Believers, and Their Officers and Directors Violated Minnesota Nonprofit and Charitable Trust Law by Allowing or Engaging in the Flagrant Misuse of Charitable Assets.

40. Les Jolies' and Real Believers' bank accounts and loans entered into by the Cooks on behalf of the nonprofit organizations show a pattern of flagrant misuse of nonprofit assets.

1. Les Jolies' Bank Accounts

41. Les Jolies has at least three Wells Fargo bank accounts (“Les Jolies Bank Accounts”).

42. Larry and Sharon Cook, both jointly and individually, are the sole signatories on the three Les Jolies bank accounts known the AGO.

43. Over one million dollars in funds were deposited in three Les Jolies Bank Accounts between April 2018 and June 2024. An analysis of the Les Jolies bank accounts showed that approximately \$798,518.58 in nonprofit funds were misused from April 1, 2018, to May 31, 2024.

44. To illustrate, Les Jolies' bank account records show the following categories of expenses from April 1, 2018, to May 31, 2024:

Expenses	Total
Amazon/Target/Walmart	\$27,446.66
Cash withdrawals from bank and ATM	\$118,400.98
Clothing	\$114,476.24
Movies	\$10,140.32
Personal	\$14,589.91
Personal - Gymnastics coaching	\$13,440.38
Restaurants	\$40,572.23
Shoes	\$6,511.92
Spa/Nails/Beauty supplies	\$28,408.48
Storage Units	\$7,288.56
Travel	\$330,916.39
CashApp - Board Members ²	\$10,348.81

² “Board Members” does not include family members who are also board members.

Expenses	Total
CashApp - Cook Family ³	\$33,262.25
CashApp - Others	\$16,276.95
CashApp - Sharon & Larry Cook	\$16,632.00
Zelle - Cook Family	\$7,227.50
Zelle - Others	\$2,579.00

45. Specific examples of the above categories of expenses include a Louis Vuitton store payment for \$1,105.95, a Michael Kors store payment for \$1,150.33, a \$2,690 payment for Nassau Jeep Adventures Ltd, a \$9,140.30 payment to Commendable, a luxury travel company, \$4,025.70 to Unique Vacations, and a \$22,000 cash withdrawal.


46. Sharon and Larry Cook made regular cash withdrawals from Les Jolies' bank accounts.

47. For example, on September 22, 2020, Larry Cook withdrew \$5,000 from a Les Jolies bank account and again, on May 11, 2022, Larry Cook withdrew \$22,000 from a Les Jolies' bank account, as shown below:

Withdrawal / Retiro:		2917	WELLS FARGO
(Check One / (Marque una) <input checked="" type="checkbox"/> Checking / Cuenta de Cheques	<input type="checkbox"/> Savings / Ahorros	<input type="checkbox"/> Money Market Access	<input type="checkbox"/> Command
Account Number / Número de cuenta			
* [REDACTED]	Date / Fecha	5/11/2022	
Please print: Name - / Para de imprenta: Nombre Larry Cook		I authorize this withdrawal from the account listed above. / Autorizo este retiro de la cuenta mencionada arriba. Please sign in table's presence for cash back. / Firme en la presencia del (de la) cajero(a) para el recibo de dinero en efectivo.	
Please print: Street, Address, City, State, Zip Code / Letrado imprenta: Domicilio, Ciudad, Estado, Código Postal 1126 MPLS		Two forms of ID may be required. / Se podrían requerir dos tipos de identificación.	
Twenty two thousand _____		\$ 22,000.00	
		Dollars	
Bank Use Only (When SVT is Not Available)		TLR9230 (06/19) WFO134 10197384	
Customer Id:	Exp date:	Token Verified <input checked="" type="checkbox"/>	Approve:
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

³ "Cook Family" includes Larry and Sharon Cook's children, siblings, and other extended family.

48. On January 14, 2022 Sharon Cook withdrew \$610 from a Les Jolies bank account, as shown below:

Withdrawal		8410	
(Check One) <input checked="" type="checkbox"/> Checking <input type="checkbox"/> Savings <input type="checkbox"/> Money Market Access <input type="checkbox"/> Command			
Account Number		Date	
* [REDACTED]		01/14/22	
Please print: Name		I authorize this withdrawal from the account listed above. Please sign in teller's presence. Two forms of ID may be required.	
Sharon Cook		X Sharon Cook	
Please print: Street Address, City, State, Zip Code			
10255 YAKES DR, MN 55443			
six hundred ten		Dollars	\$ 610.00
Bank Use Only (When SVT Is Not Available)		TLR8586 106/191 wra:ls 10035798	
Customer id	Exp. date:	Token Verified <input checked="" type="checkbox"/>	Approval
[REDACTED]			

49. Neither Sharon Cook, Larry Cook, nor the three other Les Jolies directors provided any nonprofit purpose for the questionable transactions in the Les Jolies bank accounts. In fact, in investigative depositions, Sharon Cook, Larry Cook, Danyale Potts, Risheka Remus, and Emily Neuhaus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about expenses outlined above.

2. LJP Costumes' Bank Account

50. Sharon Cook formed LJP Costumes LLC ("LJP Costumes") on July 28, 2020, as a 322C limited liability corporation. Sharon Cook is the sole member owner and registered agent. LJP Costumes appears to conduct no business outside of serving as a conduit to funnel Les Jolies' charitable funds to the Cooks.

51. On July 28, 2020, Sharon Cook opened a Wells Fargo bank account for LJP Costumes ("LJP Costumes Bank Account") with a \$100 deposit. Sharon Cook represented herself as the sole owner of the entity. The second deposit was an \$82,600 check from the U.S. Small Business Administration, which was also deposited into this account.

52. Les Jolies' charitable donations and grant funds were deposited into the LJP Costumes bank account.

53. The LJP Costumes bank account also contains money unrelated to Les Jolies, which Les Jolies admitted. Specifically, large amounts of cash were deposited into the LJP Costumes bank account, leaving the origin of these funds unknown.

54. Purchases made from the LJP Costumes bank account included: a \$17,885.29 payment to Minnestay LLC, a Minnesota vacation rental business, a \$3,253.65 payment to Grand Hyatt San Diego, a \$5,000 payment to Celebrity Cruises, a \$1,229.86 payment to Vivid Seats NBA, cash transfers of \$1,700 and \$1,116.97 to Larry Cook, a cash transfer to Danyale Potts of \$1,000, and a cash transfer of \$100 to a family member for "spending \$".

55. Les Jolies' board never agreed to or formalized a relationship with LJP Costumes, including using Les Jolies' Dance Studio or the LJP Costumes bank account. Further, no bookkeeping was done to keep Les Jolies' funds and transactions separate from LJP Costumes' funds and transactions. In investigative depositions, Sharon Cook, Danyale Potts, and Risheka Remus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about LJP Costumes' expenses and procedures.

3. Real Believers' Bank Accounts

56. Real Believers has at least two Wells Fargo bank accounts. Larry Cook is the only signatory on one account ("Larry's Real Believers Bank Account") and Sharon Cook is the only signatory on the second account ("Sharon's Real Believers Bank Account").

57. An analysis of Larry's and Sharon's Real Believers bank accounts showed that approximately \$1,310,223.87 of Real Believers' nonprofit funds were likely misused from February 6, 2018, to October 31, 2024.

58. Ninety-one percent of transactions from Larry's Real Believers bank account have no identified nonprofit purpose. In investigative depositions, Larry Cook affirmatively invoked his Fifth Amendment right to avoid criminal self-incrimination when asked about specific expenses outlined below.

59. Fifty percent of transactions from Sharon's Real Believers bank account have no identified nonprofit purpose. In investigative depositions, Larry Cook, Sharon Cook, Emily Neuhaus, and Danyale Potts affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about specific expenses outlined below.

60. Questionable expenses fell into a number of categories as detailed below from both bank accounts from February 6, 2018, to October 31, 2024, and include:

Expenses	Total
Amazon/Target/Walmart	\$15,762.60
Auto - Repairs/Car wash	\$54,208.72
Cash withdrawals from bank and ATM	\$278,710.26
Clothing	\$36,069.70
Credit Card Payments - Personal	\$50,985.31
Gift Cards	\$2,318.12
Guns	\$3,045.79
Home Depot	\$113,848.21
Jewelry	\$3,742.00
Les Jolies Petites Expenses	\$26,179.39
Lions Den Pride Covenant ⁴	\$29,171.10
Movies/Netflix	\$4,412.61
Payments ACI Financial	\$24,478.00

⁴ Lions Den Pride Covenant is an LLC owned by Larry and Sharon Cook.

Expenses	Total
Personal- Ins, HOA, home, car, misc.	\$191,722.26
Personal-Gymnastics coaching	\$7,189.86
"RBFC Poppy Construction" ⁵	\$8,128.00
Restaurants	\$71,341.54
Shoes	\$2,783.99
Spa/Nails/Beauty supplies	\$6,672.54
Storage Units	\$19,434.86
Tele Transfer to unknown bank account	\$31,550.00
Travel	\$169,462.03
World Class Barber - Supplies	\$2,732.70
CashApp - Cook Family ⁶	\$81,577.76
CashApp - Sharon & Larry Cook	\$49,860.00
Zelle - Cook Family	\$6,784.77
Zelle - Sharon & Larry Cook	\$18,051.75

61. Sharon Cook's Real Believers Bank Account shows a number of questionable transactions, including: a payment to "Capsol Villa Rentals" for \$11,737.44, two payments at the Marrion Hotel in London for \$9,482.37 and \$2,802.93, a \$2,398.50 payment at Moschino London (a luxury fashion store), and \$628.91 at Fashonnova.com (an on-line fashion store for women). In

⁵ Two entities share similar names and the same registered office address: Poppy Construction R-B-F-C Builders, an assumed name for Real Believers registered in 2006, and Poppy Construction R-B-F-C Builders LLC, a limited liability company organized in 2020 with Larry Cook as its owner and Emily Neuhaus as its registered agent and manager. There is no indication which of these two similarly named entities received the money.

⁶ "Cook Family" includes Larry and Sharon Cook's children, siblings, and other extended family.

addition, the bank account showed numerous CashApp payments for example, \$559.69 to “Sunsearay” and \$162.00 to “Danyale”.

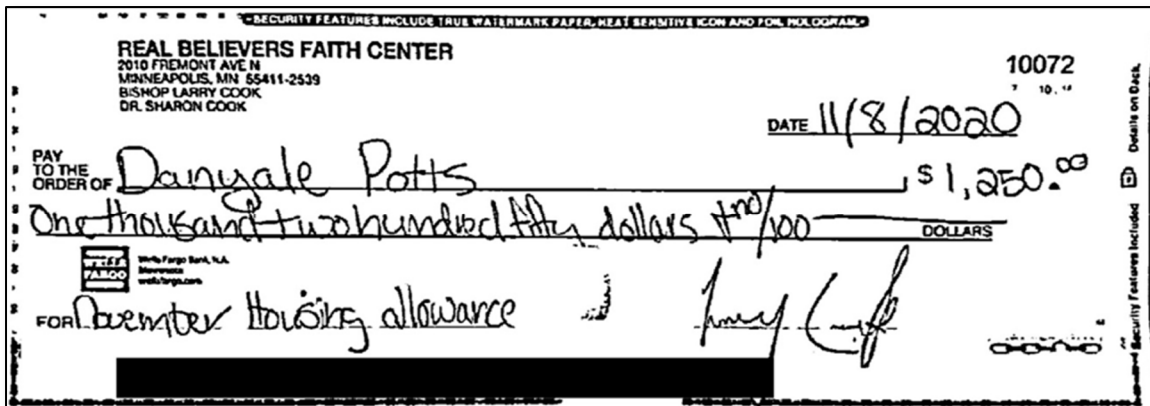
62. Larry Cook’s Real Believers Bank Account shows numerous questionable transactions, including: a \$1,140.51 payment at Bills Gun Shop, a \$1,247.26 payment at Osseo Gun Club, a \$1,029.56 payment at Watch Master Las Vegas, and a \$1,360 payment to Murray’s, a Minneapolis restaurant. The account also shows \$253,333.06 in cash and bank withdrawals, \$75,430.76 in cash transfers to Cook family members, and \$105,250.19 in travel. Larry Cook did not identify a nonprofit purpose for these questionable transactions.

63. Larry Cook frequently made cash withdrawals from Real Believers’ Wells Fargo bank accounts, and he could not explain a nonprofit purpose for these transactions. Below is an example of such a cash withdrawal dated October 11, 2022, for \$56,010.1:

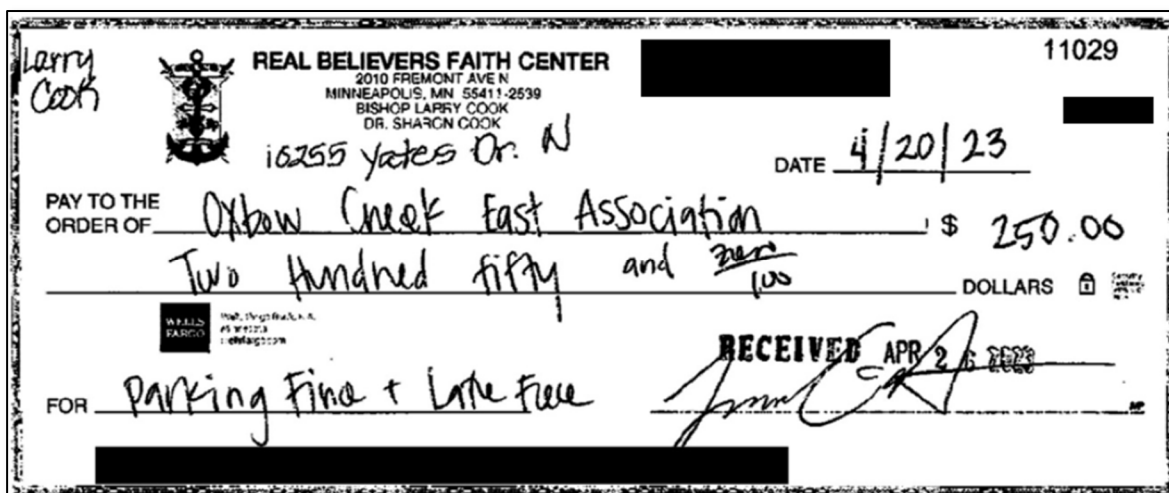
Withdrawal		4536		
(Check One)	<input checked="" type="checkbox"/> Checking	<input type="checkbox"/> Savings	<input type="checkbox"/> Money Market Access	<input type="checkbox"/> Command
* Account Number		Date 10/11/22		
Please print: Name		I authorize this withdrawal from the account listed above.		
Real Believers Larry Cook		Please sign in teller's presence. Two forms of ID may be required.		
Please print: Street Address, City, State, Zip Code		X		
12255 York Dr No.				
P.M. Six thousand ten 00/100		Dollars \$ 56010.00		
Bank Use Only (When SVT is Not Available)		1LR8586 106/191 wfo:15 20103708		
Customer ID:	Exp. date:	Token Verified <input checked="" type="checkbox"/>	Approval:	
[Redacted]				

Wells Fargo Internal Use. When Banked, Wells Fargo Confidential. When Completed

64. Other examples of misuse include a check to Danyale Potts for \$1,250 for “November Housing allowance”:



65. The Cooks even paid their homeowner's association for parking fines and late fees from a Real Believers bank account.



66. In addition to the Wells Fargo Real Believers Bank Account, Sharon Cook and Danyale Potts opened a Real Believers bank account at First Citizens Bank with themselves as the only signatories. Danyale Potts made two withdrawals from this account for \$350 and \$2,000, for which she did not identify a nonprofit purpose. Danyale Potts affirmatively invoked her Fifth Amendment right to avoid criminal self-incrimination when asked about these withdrawals.

C. The Cooks Lied about Their Personal Income and Expenses from Les Jolies on their Joint Tax Returns.

67. The Cooks provided the AGO with their 2017 through 2023 joint federal and state tax filings. No W-2 income is reported. Despite the extensive personal benefit the Cooks obtained from the nonprofits as described herein, they reported that their wages only exceeded \$30,000 one year (2018).

68. The following chart summarizes the Cooks listed occupations and the amount of income the Cooks reported to the IRS, compared to the personal benefit they obtained from the Wells Fargo Bank Accounts for Les Jolies and Real Believers:

Cooks Form 1040	2018	2019	2020	2021	2022	2023
Occupation	Barbershop Owner	Barbershop Owner	Barbershop Owner	Barber	Barber	Barber
Spouse's Occupation	-	Dance School Owner	Dance School Owner	Artistic Director	Choreographer	Choreographer
Income	\$30,300.00	\$14,909.00	\$17,038.00	\$29,766.00	\$19,456.00	\$28,447.00

Misused Funds	2018	2019	2020	2021	2022	2023
Les Jolies	\$70,317.44	\$132,342.15	\$155,763.20	\$133,836.53	\$253,221.97	\$83,977.53
Real Believers	\$22,472.36	\$37,353.42	\$29,059.34	\$3,631.99	\$969.95	\$36,312.82
Total	\$92,789.80	\$169,695.57	\$184,822.54	\$137,468.52	\$254,191.92	\$120,290.35

The Cooks' false statements to taxing authorities about the personal benefit they obtained from the charities evidence their own understanding that taking the money from the charities was unauthorized and unlawful. They also reflect the Cooks' treatment of Les Jolies and its assets as "owned" by them personally, versus owned by an independent nonprofit for charitable purposes.

D. The Cooks Recklessly Entered Multiple Loan Agreements Using Nonprofit Assets as Collateral for their Personal Benefit.

69. As described below, the Cooks executed multiple loan and mortgage agreements purportedly on behalf of the nonprofits. In addition to recklessly subjecting the nonprofits to needly liability, these loans served no benefit to the nonprofit. Instead, the proceeds were funneled to the Cooks for their personal ventures, leaving the nonprofit holding the bag with nothing to show for it in return.

1. Les Jolies

70. Les Jolies obtained two mortgages with The Money Man LLC (“Money Man”) in 2022 for \$75,000 and \$32,500.

71. Sharon Cook as “Managing Member” and Larry Cook as “Member” of Les Jolies signed for the two mortgages, attesting that they represented Les Jolies and were authorized to execute the mortgages. The Dance Studio is the collateral for both mortgages.

72. The loan proceeds were deposited into a Les Jolies Wells Fargo bank account to which Sharon and Larry Cook had sole access.

73. \$10,500 of the \$32,500 loan was used to pay the Money Man for two months of overdue interest on a separate loan that Real Believers held with the Money Man.

74. These mortgages were not approved by Les Jolies’ board of directors.

2. Real Believers Using Church Building as Collateral

75. In 2019, Larry Cook, as Real Believers’ president, signed a \$210,000 loan from Money Man, secured by the Church Building (“First Money Man Loan”).

76. Larry Cook did not identify the First Money Man Loan’s purpose or where the funds were deposited.

77. In 2021, Larry Cook applied for and received a loan renewal and modification from BMO Bank for \$151,760.48, secured by the Church Building.

78. Larry Cook did not identify the BMO loan's purpose. In investigative depositions, Larry Cook affirmatively invoked his Fifth Amendment right to avoid criminal self-incrimination when asked about the specific loans outlined above.

79. In 2023, Larry Cook, as Real Believers' President, applied for and received a \$375,000 loan from the Money Man, again using the Church Building as collateral ("Second Money Man Loan").

80. Around June 2025, Real Believers sold the Church Building to AKY Group LLC for \$1,080,000. Soon thereafter, AKY Group LLC entered into a contract for deed with Real Believers for the Church Building for the same amount, \$1,080,000 at 11.05% interest.

81. These loans were not approved by Real Believers' board of directors.

3. Real Believers Using Woods House as Collateral

82. On April 5, 2023, Real Believers took out a mortgage with Falcon National Bank for \$182,000 using the Woods House as collateral ("Falcon Bank Loan"). Larry Cook, as Real Believers' President, signed for this mortgage.

83. Neither Larry Cook nor Emily Neuhaus identified to the AGO the Falcon Bank Loan's purpose or where the funds were deposited. In investigative depositions, Larry Cook and Emily Neuhaus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about the specific loan outlined above.

E. The Cooks Formed For-Profit Businesses with Names Nearly Identical to Nonprofits.

1. Real Believers and Real Believers Faith Center LLC

84. Real Believers Faith Center LLC (“Real Believers LLC”) was formed in October 2022. Larry and Sharon Cook are the owners, managers, and registered agents of Real Believers LLC. Real Believers LLC’s registered office address is the same as Real Believers’ address, the Church Building. Even though Real Believers LLC shares a similar name as the nonprofit church, it is a completely separate, for-profit entity owned by the Cooks.

85. Real Believers LLC opened a Wells Fargo bank account on October 26, 2022 (“LLC Bank Account”). Larry Cook, Sharon Cook, Makada Williams, and Danyale Potts are signatories on the LLC Bank Account.

86. Revenue from the nonprofit entities was deposited in this for-profit’s bank accounts. For example, U.S. Department of Treasury checks written out to LJP School of Dance and Real Believers were deposited into the LLC Bank Account.

87. A cashier’s check from Falcon Bank to Real Believers for \$10,000 was deposited into the LLC Bank Account.

88. Checks from Lions Den Pride Covenant Enterprises (“Covenant Enterprises”), which is discussed further below, are the most frequent deposits into the LLC Bank Account.

89. Neither Larry Cook nor Danyale Potts explained the purpose of Real Believers LLC or the relationship between Real Believers and Real Believers LLC. In investigative depositions, Larry Cook and Danyale Potts affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about these specific details related to Real Believers LLC.

2. Real Believers, Lions Den Pride Covenant Enterprises, and Real Believers LLC

90. Larry Cook, claiming to represent Real Believers, also entered contracts to lease two parcels of property located at 1120 W. Broadway Ave., Minneapolis, MN (“1120 Broadway”): a gas station/convenience store (“gas station”) and a fast-food restaurant (“restaurant”). In investigative depositions, Larry Cook, Danyale Potts, and Emily Neuhaus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about 1120 Broadway.

91. Real Believers, by Larry Cook, referred to as “sr. pastor RBFC”, signed a License Agreement with Rayan Properties LLC (“Rayan”), effective November 1, 2022, to run a gas station/convenience store on the gas station parcel.

92. The License Agreement required Real Believers to pay Rayan a \$70,000 non-refundable upfront license fee and a monthly sum of \$6,000 due on the first of every month. The License Agreement contained a \$600 late fee provision and a termination provision that allowed Rayan to confiscate the property and remove Real Believers if the monthly rent was not paid for 20 days.

93. Larry and Sharon Cook opened Lion’s Den Gas Station (“Lion’s Den”) at 1120 Broadway on November 1, 2022. Lion’s Den advertised a new management celebration with the hashtag #RBFCJoinUS on its Facebook page:




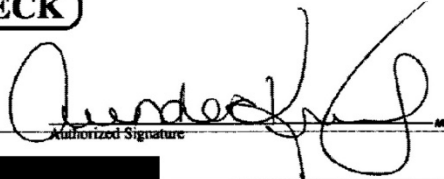
94. On November 11, 2022, Real Believers hosted a “Dominion Celebration” at 2010 Fremont Avenue, Minneapolis, advertising itself as “The Church That Owns The Gas Station” and featuring a picture of Lion’s Den. In reality, Real Believers never owned the gas station.

95. News articles in and around November 2022 talked about Real Believers purchasing the gas station and calling it “The Lion’s Den.”

96. “The Lion’s Den” is not registered with the Minnesota Secretary of State. Lions Den Pride Covenant Enterprises LLC (“Covenant Enterprises”) is registered as a 322C Minnesota Limited Liability Company. The manager is located at 1120 W Broadway, and the registered agent is Larry Cook. Larry and Sharon Cook opened bank accounts for Covenant Enterprises as its owners.

97. Lion’s Den deposited its proceeds into Covenant Enterprises’ bank accounts, with Larry and Sharon Cook as signatories.

98. Real Believers transferred funds to “Lions Den.” For example, on January 24, 2023, Real Believers paid “Lions Den” \$13,500. This check was then deposited into a Covenant Enterprises bank account with Sharon and Larry Cook as the sole signatories. In investigative depositions, Larry Cook affirmatively invoked his Fifth Amendment right to avoid criminal self-incrimination when asked about the nonprofit purpose of this specific transaction.

Remitter: Real Believers Faith Center			<i>Spoke w/ Jordan</i> 1/24/23 3:50pm	No. 17816 <i>verified</i>
		9600 Upland Lane N., Suite 100 Maple Grove, MN 55369	Date: 01/24/23	
Pay to the Order of Lions Den				Amount \$*****13,500.00
Thirteen Thousand Five Hundred and 00/100*****				DOLLARS
<small>THE PURCHASE OF AN INDEMNITY BOND WILL BE REQUIRED BEFORE ANY CASHIER'S CHECK OF THIS BANK WILL BE REPLACED OR REFUNDED IN THE EVENT IT IS LOST, MISPLACED OR STOLEN</small>		CASHIERS CHECK		<small>Details on back. Security Features included.</small>
Memo _____		 Authorized Signature		

99. On January 11, 2023, Larry Cook, as “Chief Manager of Real Believers Faith Center LLC”, took out a letter of credit up to \$30,000 at Falcon Bank to provide gas for the gas station. The line of credit was secured by Real Believers’ Falcon Bank checking account, with President Larry Cook, Makada Williams, and Emily Neuhaus, among others, as signatories. Larry Cook signed the Falcon Bank loan documents on behalf of both the borrower Real Believers Faith Center LLC and the grantor Real Believers.

100. On February 6, 2024, Lions Day Café, LLC (“Lions Day”), whose address is 10255 Yates Drive North in Minneapolis, entered into an Assignment Agreement with Crispy Chicken LLC (“Crispy Chicken”) regarding the restaurant parcel of 1120 Broadway. The Assignment Agreement treats Real Believers and Lions Day as the same entity, assigning the interests to Real Believers. Larry Cook, as CEO of Real Believers, and Sharon Cook, as CEO of Lions Day, signed the Assignment Agreement.

101. Lions Day Café, LLC is not currently registered with the Minnesota Secretary of State. However, Lions Den Café LLC incorporated in December 2022 as a 322C with Larry Cook listed as the manager and organizer and 10255 Yates Dr. N., Brooklyn Park, MN 55443 as the registered office address.

102. Due to Real Believers' Purchase and License Agreements with Rayan and its Assignment Agreement with Crispy Chicken, Larry Cook and the other signatories subjected Real Believers to extensive unnecessary liability and Real Believers is now a defendant in two separate lawsuits for eviction and breach of contract claims.

3. Poppy Construction R-B-F-C Builders and Poppy Construction R-B-F-C Builders LLC

103. In 2006, Larry Cook registered Poppy Construction R-B-F-C Builders ("Poppy Construction R-B-F-C") as an assumed name for Real Believers.

104. In July 2020, Poppy Construction R-B-F-C Builders LLC ("Poppy LLC") registered as a 322C, with the same registered office address as Real Believers. Poppy LLC's registered agent and manager is Emily Neuhaus, a Les Jolies director and officer and Real Believers' director of finance. Larry Cook is Poppy LLC's owner. In 2020, Poppy LLC received a \$18,973 loan from the U.S. Small Business Administration.

105. In 2019, Les Jolies selected "Poppy Construction's" "bid" for a construction project funded by a grant from the Metropolitan Regional Arts Council ("MRAC"). The grant application only referred to "Poppy Construction" and did not distinguish between Poppy Construction R-B-F-C or Poppy LLC. The grant application stated that "Poppy Construction" was selected because of their familiarity with Les Jolies' building, past projects for Les Jolies, and 20 years of experience in the industry. Les Jolies named Emily Neuhaus as project personnel and Larry Cook as a board member on the grant application. The grant application did not mention Poppy Construction's ownership or any conflict of interest.

106. Les Jolies' board meeting minutes do not show any discussion of the conflict of interest between Larry Cook, Emily Neuhaus, Poppy Construction R-B-F-C, and Poppy LLC or the transaction being fair and reasonable to Les Jolies. Larry Cook's and Emily Neuhaus' dual

interests in Les Jolies and Poppy LLC were not fully disclosed. Furthermore, there was no indication that Larry Cook and Emily Neuhaus recused themselves from the discussion or board vote to grant Poppy LLC the construction contract.

107. In July 2024, Larry Cook opened a bank account for Poppy LLC, indicating it was a for-profit LLC and that he was the owner. A \$2,500 check to “Poppy Construction” from West Broadway Business and Area Coalition (“West Broadway”) was deposited into this account. The West Broadway check was endorsed by Emily Neuhaus and Larry Cook. Six days later, \$2,300 was withdrawn from the Poppy LLC account.

108. In or around May and June 2020 Real Believers wrote several checks from one of its bank accounts that said for “Poppy” in the subject line. In investigative depositions, Larry Cook affirmatively invoked his Fifth Amendment right to avoid criminal self-incrimination when asked about the nonprofit purpose of these specific transactions.

109. Neither Larry Cook nor Emily Neuhaus clarified the relationship between Poppy Construction R-B-F-C and Poppy LLC. In investigative depositions, Larry Cook and Emily Neuhaus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about the relationship between Poppy Construction R-B-F-C and Poppy LLC.

F. Les Jolies and Real Believers Violated Additional Nonprofit Act Governance Standards.

1. Les Jolies

110. Les Jolies kept no accounting records, financial statements or board meeting minutes.

111. While Makada Williams and Sunsearay Washington are named as Les Jolies’ treasurers, the defendants have not demonstrated that anyone, including Makada Williams and Sunsearay Washington, met the requirements for a treasurer, either under the relevant statutes or

Les Jolies' bylaws. Only Sharon and Larry Cook had access to Les Jolies' Wells Fargo bank accounts. There is no indication that an account of transactions and of the financial conditions of the corporation was ever provided to the Les Jolies board. In investigative depositions, Larry Cook, Sharon Cook, Danyale Potts, Emily Neuhaus, and Risheka Remus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about Les Jolies' governance as outlined above, including being asked to name the treasurer and board members, if financial records were maintained, and if board meetings were held.

112. Les Jolies appears to be operating without sufficient board oversight. For example, Les Jolies has not been registered with the AGO as a soliciting charitable organization or charitable trust since July 15, 2008. Les Jolies failed to file the required annual reports or information filings with the AGO. Les Jolies only filed the required IRS Form 990 Return of Organization Exempt from Income Tax for 2016—and two separate returns were filed and signed by different individuals for tax year 2016. Les Jolies' tax-exempt status was automatically revoked by the IRS for failing to file returns on May 15, 2020. Les Jolies also failed to respond to a request for deficiencies in its answers to a civil investigative demand ("CID") that the AGO served on April 16, 2024.

113. The misuse of a significant portion of the nonprofit's assets demonstrates the board's failure to exercise its duty of care and adequately supervise the organization.

2. Real Believers

114. Real Believers failed to provide evidence to show it held board meetings at least once a year or maintain meeting minutes, accounting records, or financial statements.

115. No individual meets the statutory definition of treasurer for Real Believers. Only Sharon and Larry Cook had access to Real Believers' Wells Fargo bank accounts. There is no indication that an account of transactions and of the financial conditions of the corporation was

ever provided to the Real Believers board. In investigative depositions, Larry Cook, Sharon Cook, Danyale Potts, and Emily Neuhaus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about Real Believers' governance outlined above, including being asked about to name the treasurer and board members, if financial records were maintained, and if board meetings were held.

116. Real Believers appears to be operating without sufficient board oversight. For example, Real Believers failed to respond to a CID that the AGO served on September 6, 2024. Most egregious, the misuse of a significant portion of the nonprofit's assets, the considerable number of mortgages taken out by the Cooks using the church property as collateral, and the entering into legal contracts that exposed the nonprofit to litigation demonstrates the board's failure to exercise its duty of care and adequately supervise the organization. In investigative depositions, Larry Cook, Danyale Potts, and Emily Neuhaus affirmatively invoked their Fifth Amendment right to avoid criminal self-incrimination when asked about Real Believers' financial obligations and transactions outlined above.

G. Les Jolies Failed to Maintain Its Registration as a Soliciting Charity or a Soliciting Trust.

117. Les Jolies is a charitable nonprofit corporation that solicited donations for a charitable purpose. Les Jolies applies for grant funds, solicits donations on its website, hosts fundraisers, and charges tuition and fees.

118. The Minnesota Supervision of Charitable Trusts and Trustees Act and the Minnesota Charitable Solicitation Act require most organizations with a charitable purpose with gross assets of \$25,000 or more to register as either a charitable trust or soliciting charity and file reports annually with the AGO.

119. Mandatory registration and annual disclosures by charitable organizations create transparency and accountability, which instills public trust in Minnesota charities and encourages charitable giving. Registration and disclosure also alert the AGO to financial irregularities.

120. Les Jolies has not been registered with the AGO as either a soliciting charitable organization under chapter 309 or a charitable trust, which it admitted. Les Jolies filed its initial registration with the AGO in 1999 and filed its last complete annual report for FYE 06. Since July 15, 2008, Les Jolies has not been registered as a charitable organization in the State of Minnesota.

H. Sharon Cook Improperly Dissolved the Corporation During AGO's Investigation into Les Jolies.

121. On March 10, 2025, the AGO took the sworn testimony of Larry and Sharon Cook pursuant to Minn. Stat. § 8.31, seeking information related to Les Jolies' and Real Believers' governance and finances.

122. On March 25, 2025, Les Jolies filed dissolution paperwork with the Minnesota Secretary of State, during the AGO's investigation and without providing proper notice to the AGO as required by Minn. Stat. § 317A.811. In fact, Les Jolies provided no notice to the AGO. Sharon Cook signed as the authorized agent. Sharon Cook falsely indicated in her paperwork to the Minnesota Secretary of State that Les Jolies was a corporation that was not required to provide notice to the AGO under Minn. Stat. § 317A.811.

123. On March 27, 2025, Les Jolies Petites School of Dance INC incorporated as a 302A, with Real Believers as its registered agent and 2010 Fremont Ave. N., Minneapolis, MN 55411-2539 as its registered office address. This indicates a likely diversion of nonprofit assets for improper purposes.

COUNT I
BREACH OF NONPROFIT DIRECTOR AND OFFICER FIDUCIARY DUTIES UNDER
THE MINNESOTA NONPROFIT CORPORATION ACT
(SHARON COOK, LARRY COOK, DANYALE POTTS, MAKADA WILLIAMS,
SUNSEARAY WASHINGTON, RISHEKA REMUS, EMILY NEUHAUS)

124. The State re-alleges all prior paragraphs of this Complaint.

125. The Minnesota Nonprofit Corporation Act, Minn. Stat. ch. 317A, imposes upon all directors and officers of a nonprofit corporation the duty of loyalty and care. “A director shall discharge the duties of the position of director in good faith, in a manner the director reasonably believes to be in the best interests of the corporation, and with the care an ordinarily prudent person in a like position would exercise under similar circumstances.” Minn. Stat. § 317A.251, subd. 1; *see also* Minn. Stat. § 317A.361 (applying same standard to nonprofit officers).

126. Minn. Stat. § 317A.361 provides that “[a]n officer shall discharge the duties of an office in good faith, in a manner the officer reasonably believes to be in the best interests of the corporation, and with the care an ordinary prudent person in a like position would exercise under similar circumstances.”

127. Officers of a nonprofit corporation owe various fiduciary duties to that corporation, including the duties to act in good faith, with honesty in fact, with loyalty, in the best interests of the corporation, and with the care of an ordinary, prudent person under similar circumstances. *Shepard of the Valley Lutheran Church v. Hope Lutheran Church*, 626 N.W.2d 436, 442 (Minn. Ct. App. 2001) (citing chapter 317A). Duty of loyalty violations “encompass fraud, self-dealing, and improper diversion of corporate assets.” Restatement of the Law, Charitable Nonprofit Orgs. § 2.02 (2021). Accordingly, assets are not to be diverted for personal benefit

128. Minn. Stat. § 317A.011, subd. 15, defines “officer” as “the president, the treasurer, however designated, a person elected, appointed, or otherwise designated as an officer pursuant to section 317A.311, and a person deemed elected an officer under sections 317A.321.” In the

absence of an election, the person exercising the principal functions of the president or the treasurer is considered to have been elected to the office. Minn. Stat. § 317A.3221.

129. Minn. Stat. § 317A.011, subd. 7, defines “director” as a member of the board.

I. BREACHES AS TO LES JOLIES:

130. Sharon Cook is a director of Les Jolies because she is on the board of directors.

131. Sharon Cook is an officer of Les Jolies because she exercised the principal functions of and presented herself as president of the corporation.

132. Sunsearay Washington is a director of Les Jolies because she is on the board of directors.

133. Sunsearay Washington is an officer of Les Jolies because she presented herself as Les Jolies’ treasurer.

134. Makada Williams is a director of Les Jolies because she is on the board of directors.

135. Makada Williams is an officer of Les Jolies because she presented herself as Les Jolies’ treasurer.

136. Larry Cook is a director of Les Jolies because he is on the board of directors.

137. Emily Neuhaus is a director of Les Jolies because she is on the board of directors.

138. Risheka Remus is a director of Les Jolies because she is on the board of directors.

139. As officers and directors of Les Jolies, Sharon Cook, Sunsearay Washington, Makada Williams, Larry Cook, Danyale Potts, Risheka Remus, and Emily Neuhaus each owed fiduciary duties of care and loyalty to Les Jolies.

140. Sharon Cook breached her duty of loyalty to Les Jolies by, among other things:

- a. Using nonprofit funds as personal income and using nonprofit money to pay for personal expenses;
- b. Committing \$798,518.58 in unrelated spending on the Les Jolies accounts;

- c. Depositing nonprofit funds into her for-profit LLC bank account; and
 - d. Using a nonprofit asset to obtain two mortgages for personal benefit.
141. Sharon Cook breached her duty of care by among other things:
- a. Failing to file Les Jolies' Form 990s with the IRS since 2016;
 - b. Failing to maintain Les Jolies' tax-exempt status;
 - c. Failing to maintain registration with the Minnesota Attorney General's Office;
 - d. Failing to maintain books and records;
 - e. Failing to have procedures in place for handling Les Jolies' finances and expenses;
 - f. Failing to inform the board of conflicts of interest that arose with LJP Costumes; and
 - g. Improperly dissolving Les Jolies during the AGO's investigation and without providing proper notice to the AGO as required by Minn. Stat. § 317A.811.
142. Larry Cook breached his duty of loyalty to Les Jolies by, among other things:
- a. Using nonprofit funds as personal income and using nonprofit money to pay for personal expenses;
 - b. Committing \$798,518.58 in unrelated spending on the Les Jolies accounts; and
 - c. Using a nonprofit asset to obtain two mortgages for personal benefit.
143. Larry Cook breached his duty of care by, among other things:
- a. Failing to question or request an inspection of Les Jolies' books and records;
 - b. Failing to protect, preserve, and maintain Les Jolies' charitable assets in a fashion consistent with the purpose for which they were given; and
 - c. Failing to institute internal controls to protect Les Jolies' charitable assets.

144. Sunsearay Washington breached her duty of loyalty by among other things taking money from Les Jolies for purposes unrelated to the nonprofit's mission.

145. Sunsearay Washington breached her duty of care by, among other things:

- a. Failing to question or request an inspection of Les Jolies' books and records;
- b. Failing to protect, preserve, and maintain Les Jolies' charitable assets in a fashion consistent with the purpose for which they were given; and
- c. Failing to institute internal controls to protect Les Jolies' charitable assets.

146. Makada Williams breached her duty of loyalty by among other things taking money from Les Jolies for purposes unrelated to the nonprofit's mission.

147. Makada Williams breached her duty of care by, among other things:

- a. Failing to question or request an inspection of Les Jolies' books and records;
- b. Failing to protect, preserve, and maintain Les Jolies' charitable assets in a fashion consistent with the purpose for which they were given; and
- c. Failing to institute internal controls to protect Les Jolies' charitable assets.

148. Danyale Potts breached her duty of loyalty by among other things taking money from Les Jolies for purposes unrelated to the nonprofit's mission.

149. Danyale Potts breached her duty of care by, among other things:

- a. Failing to actively participate in the management and operation of the organization;
- b. Failing to question or request an inspection of Les Jolies' books and records;
- c. Failing to protect, preserve, and maintain Les Jolies' charitable assets in a fashion consistent with the purpose for which they were given; and
- d. Failing to institute internal controls to protect Les Jolies' charitable assets.

150. Risheka Remus breached her duty of loyalty by among other things taking money from Les Jolies for purposes unrelated to the nonprofit's mission.

151. Risheka Remus breached her duty of care by, among other things:
- a. Failing to actively participate in the management and operation of the organization;
 - b. Failing to question or request an inspection of Les Jolies' books and records;
 - c. Failing to protect, preserve, and maintain Les Jolies' charitable assets in a fashion consistent with the purpose for which they were given; and
 - d. Failing to institute internal controls to protect Les Jolies' charitable assets.

152. Emily Neuhaus breached her duty of loyalty by among other things taking money from Les Jolies for purposes unrelated to the nonprofit's mission.

153. Emily Neuhaus breached her duty of care by, among other things:
- a. Failing to actively participate in the management and operation of the organization;
 - b. Failing to question or request an inspection of Les Jolies' books and records;
 - c. Failing to protect, preserve, and maintain Les Jolies' charitable assets in a fashion consistent with the purpose for which they were given; and
 - d. Failing to institute internal controls to protect Les Jolies' charitable assets.

154. Sharon Cook, Larry Cook, Danyale Potts, Makada Williams, Sunsearay Washington, Risheka Remus, and Emily Neuhaus' conduct, practices, and actions described in this Compliant constitute multiple, flagrant violations of the Nonprofit Act.

II. BREACHES AS TO REAL BELIEVERS:

155. Larry Cook is a director of Real Believers because he is a member of the board of directors.

156. Larry Cook is an officer of Real Believers because he exercised the principal functions of and presented himself as president of the corporation.

157. Emily Neuhaus is a director of Real Believers because she is a member of the board of directors.

158. Emily Neuhaus is an officer of Real Believers because she presented herself as treasurer of the corporation.

159. Sharon Cook is a director of Real Believers because she is a member of the board of directors.

160. Sunsearay Washington is a director of Real Believers because she is a member of the board of directors.

161. Danyale Potts is a director of Real Believers because she is a member of the board of directors.

162. Makada Williams is a director of Real Believers because she is member of the board of directors.

163. As officers and directors of Real Believers, Larry Cook, Emily Neuhaus, Sharon Cook, Danyale Potts, Sunsearay Washington, and Makada Williams each owed fiduciary duties to Real Believers.

164. The fiduciary duties imposed by Minn. Stat. ch. 317A include the duty of care and duty of loyalty.

165. Larry Cook breached his duty of loyalty to Real Believers by, among other things:

- a. Using nonprofit funds as personal income and using nonprofit money to pay for personal expenses;
- b. Committing \$1,310,223.87 in unrelated spending on the Real Believers' s accounts;
- c. Depositing nonprofit funds into his for-profit LLC bank accounts; and
- d. Using nonprofit assets to obtain multiple mortgages for personal benefit.

166. Larry Cook breached his duty of care to Real Believers by, among other things:

- a. Failing to maintain books and records;

- b. Failing to have procedures in place for handling Real Believers' finances and expenses;
 - c. Failing to inform the board of conflicts of interest that arose;
 - d. Selling a nonprofit asset to obtain a personal benefit;
 - e. Signing a License Agreement on behalf of Real Believers for use of a gas station and depositing the proceeds from that agreement into the bank account for Cook's for-profit business; and
 - f. Embroiling Real Believers in two lawsuits as a defendant.
167. Sharon Cook breached her duty of loyalty to Real Believers by, among other things:
- a. Using nonprofit funds as personal income and using nonprofit money to pay for personal expenses;
 - b. Committing \$1,310,223.87 in unrelated spending on the Real Believers' accounts;
 - c. Depositing nonprofit funds into her for-profit LLC bank accounts; and
168. Sharon Cook breached her duty of care by, among other things:
- a. Failing to question or request an inspection of Real Believers' books and records;
 - b. Failing to protect, preserve, and maintain Real Believers' charitable assets in a fashion consistent with the purpose for which they were given;
 - c. Failing to institute internal controls to protect Real Believers' charitable assets; and
 - d. Failing to inform the board of conflicts of interest with companies that Sharon Cook owned.
169. Sunsearay Washington breached her duty of loyalty by among other things taking money from Real Believers for purposes unrelated to the nonprofit's mission.
170. Sunsearay Washington breached her duty of care by, among other things:
- a. Failing to actively participate in the management and operation of the organization;

- b. Failing to question or request an inspection of Real Believers' books and records;
- c. Failing to protect, preserve, and maintain Real Believers' charitable assets in a fashion consistent with the purpose for which they were given; and
- d. Failing to institute internal controls to protect Real Believers' charitable assets.

171. Danyale Potts breached her duty of loyalty by among other things using nonprofit funds as personal income and using nonprofit money to pay for personal expenses.

172. Danyale Potts breached her duty of care by, among other things:

- a. Failing to actively participate in the management and operation of the organization;
- b. Failing to question or request an inspection of Real Believers' books and records;
- c. Failing to protect, preserve, and maintain Real Believers' charitable assets in a fashion consistent with the purpose for which they were given; and
- d. Failing to institute internal controls to protect Real Believers' charitable assets.

173. Emily Neuhaus breached her duty of loyalty by among other things taking money from Real Believers for purposes unrelated to the nonprofit's mission.

174. Emily Neuhaus breached her duty of care by, among other things:

- a. Failing to actively participate in the management and operation of the organization;
- b. Failing to question or request an inspection of Real Believers' books and records;
- c. Failing to protect, preserve, and maintain Real Believers' charitable assets in a fashion consistent with the purpose for which they were given; and
- d. Failing to institute internal controls to protect Real Believers' charitable assets.

175. Makada Williams breached her duty of loyalty by among other things taking money from Real Believers for purposes unrelated to the nonprofit's mission.

176. Makada Williams breached her duty of care by, among other things:

- a. Failing to actively participate in the management and operation of the organization;
- b. Failing to question or request an inspection of Real Believers' books and records;
- c. Failing to protect, preserve, and maintain Real Believers' charitable assets in a fashion consistent with the purpose for which they were given; and
- d. Failing to institute internal controls to protect Real Believers' charitable assets.

177. Larry Cook's, Sharon Cook's, Danyale Potts', Sunsearay Washington's, Emily Neuhaus', and Makada Williams's conduct, practices and actions described in this Complaint constitute multiple, flagrant violations of the Nonprofit Act.

**COUNT II
BREACH OF TRUST
(LARRY COOK AND SHARON COOK)**

184. The State re-alleges all prior paragraphs of this Complaint.

185. The Minnesota Supervision of Charitable Trusts and Trustee Act ("Charitable Trust Act") is included in Minn. Stat. §§ 501B.36 to 501B.55.

186. The Charitable Trust Act defines "charitable purpose" as an actual or purported charitable, philanthropic, religious, social service, educational, eleemosynary, or other public use of purpose. Minn. Stat. § 501B.35, subd. 2.

187. A person or group of persons, or a director or office is considered to be a trustee with respect to a corporation if they were "vested with the control or responsibility of administering property held for a charitable purpose." Minn. Stat. § 501B.35, subdiv. 4.

188. Trustees of a “charitable trust” must register the charitable trust under 501B.37 and administer and manage property held for a charitable purpose consistent with their fiduciary obligations. Minn. Stat. § 501B.41, subdiv. 6.

189. Larry Cook was vested with the control or responsibility of administering property held for a charitable purpose with Les Jolies. Larry Cook is a director of Les Jolies who opened multiple Les Jolies bank accounts that only he and Sharon Cook have access to.

190. Larry Cook failed to “administer and manage property held for charitable purposes” consistent with fiduciary obligations pursuant to Minn. Stat. § 501B.41, subdiv. 6 by, among other things:

- a. Using nonprofit funds held for a charitable purpose for personal benefit.
- b. Making distributions of nonprofit funds held for a charitable purpose to purposes not authorized by the donor.
- c. Taking regular, large cash withdrawals from the Les Jolies bank accounts.
- d. Awarding himself contracts for his other businesses.

191. Sharon Cook failed to “administer and manage property held for charitable purposes” consistent with fiduciary obligations and the law pursuant to Minn. Stat. § 501B.41, subdiv. 6 by, among other things:

- a. Using nonprofit funds held for a charitable purpose for personal benefit.
- b. Making distributions of nonprofit funds held for a charitable purpose to purposes not authorized by the donor.
- c. Taking regular, large cash withdrawals from the Les Jolies bank accounts.
- d. Depositing nonprofit funds held for a charitable purpose into her for-profit LLC bank account.

Larry Cook’s and Sharon Cook’s conduct, practices and actions described in this Complaint constitute multiple, flagrant violations of the Charitable Trust Act.

COUNT III
VIOLATIONS OF THE MINNESOTA NONPROFIT CORPORATION ACT
(LES JOLIES AND REAL BELIEVERS)

178. The State re-alleges all prior paragraphs of this Complaint.

179. The Minnesota Nonprofit Corporation Act provides several requirements for a nonprofit corporation, including:

- a. Nonprofit corporations must be “managed by or under the direction of a board of directors.” Minn. Stat. § 317A.201.
- b. Nonprofit corporations must have no fewer than three members on the Board of Directors. Minn. Stat. § 317A.203.
- c. Nonprofits must hold at least one board meeting a year. Minn. Stat. § 317A.203, subd. 1.
- d. The treasurer for the nonprofit is required to “keep accurate financial records for the corporation.” Minn. Stat. § 317A.305, subd. 3.
- e. Transactions implicating a conflict of interest as defined by statute must meet the requirements of Minn. Stat. § 317A.255.
- f. Specified charitable nonprofit “corporations shall notify the attorney general of their intent to dissolve” and “may not transfer or convey assets as part of a dissolution . . . until 45 days after it has given written notice to the attorney general, unless the attorney general waives all or part of the waiting period.” Minn. Stat. § 317A.811.
- g. Absent an exception, when a corporation converts, dissolves, merges, consolidates, transfers its assets, substantially changes their use, or grants a security interest, its assets must remain dedicated to their original or donor-intended purpose and may not be diverted. Minn. Stat. § 317A.671.

180. Les Jolies committed several violations of the Minnesota Nonprofit Corporation Act, including:

- a. Les Jolies was not managed by or under the direction of the board.
- b. Les Jolies failed to record and maintain meeting minutes from its board meetings.
- c. Les Jolies failed to follow the procedure outlined by Minn. Stat. § 317A.255 and its own by-laws in handling conflicts of interest.

- d. Les Jolies failed to maintain adequate books and records as required by Minn. Stat. § 317A.461, subd. 1.
- e. Les Jolies dissolved without providing the required notice to the AGO in violation of Minn. Stat. § 317A.811.
- f. Les Jolies diverted assets from their original nonprofit purpose in violation of Minn. Stat § 317A.671.

181. Real Believers committed several violations of the Minnesota Nonprofit Corporation Act, including:

- a. Real Believers was not managed by or under the direction of its board.
- b. Real Believers failed to hold annual board meetings.
- c. Real Believers failed to record and maintain meeting minutes from its board meetings.
- d. Real Believers failed to follow the procedure outlined by Minn. Stat. § 317A.255 in handling conflicts of interest.
- e. Real Believers failed to maintain adequate books and records as required by Minn. Stat. § 317A.461, subd. 1.

182. Les Jolies' and Real Believers' conduct, practices, and actions described in this Complaint constitute multiple, flagrant violations of the Minnesota Nonprofit Corporations Act.

**COUNT IV
 GROUNDS FOR EQUITABLE RELIEF UNDER THE MINNESOTA NONPROFIT
 CORPORATION ACT
 (LES JOLIES AND REAL BELIEVERS)**

192. The AGO re-alleges all prior paragraphs of this Complaint.

193. Minn. Stat. § 317A.751, subd. 1, provides that:

A court may grant equitable relief it considers just and reasonable in the circumstances or may dissolve a corporation and liquidate its assets and business as provided in this section.

194. Minn. Stat. § 317A.751, subd. 5, provides that “[a] court may grant equitable relief in any action by the attorney general when it is established, among other things, that:

(4) the corporation has flagrantly violated a provision of this chapter, has violated a provision of this chapter more than once, or has violated more than one provision of this chapter;

(5) the corporation has engaged in an unauthorized act, contract, conveyance, or transfer or has exceeded its powers;

....

(11) the corporation has answered falsely or failed to answer a reasonable written interrogatory from the secretary of state, the attorney general, the commissioner of human services, commissioner of commerce, or commissioner of revenue, to the corporation, its officers, or directors;

....

(13) the corporation has fraudulently used or solicited property.

195. Multiple, disjunctive grounds, each independently supporting equitable relief under Minn. Stat. § 317A.751, subd. 5 are met here for Les Jolies, including:

- a. Les Jolies' numerous and flagrant violations of the requirements of Minn. Stat. §§ 317A.021 to 317A.155, constitutes grounds for equitable relief under Minn. Stat. § 317A.751, subd. 5(4), including failing to maintain meeting minutes or financial records, failure to provide any notice to the AGO of its intent to dissolve and to wait 45 days to distribute its assets, and failing to require any individual to perform the required duties of a treasurer in violation of Minn. Stat. § 317A.305.
- b. Les Jolies numerous unauthorized transfers as outlined above, including in violation of Minn. Stat. § 317A.255;
- c. Les Jolies' false answers to several reasonable written interrogatories, constituting grounds for equitable relief under Minn. Stat. § 317A.751, subd. 5(11), including failing to disclose all corporations in which Les Jolies' board members had an ownership interest or served as a director, officer, or manager.
- d. Les Jolies' fraudulent solicitation of property, purportedly for charitable purposes, that was actually used for personal benefit, pursuant to Minn. Stat. § 317A.751, subdiv. (5)(13).

196. Multiple, disjunctive grounds, each independently support equitable relief under Minn. Stat. § 317A.751, subd. 5 for Real Believers, including:

- a. Real Believers’ numerous and flagrant violations of the requirements of Minn. Stat. §§ 317A.021 to 317A.155, constituting grounds for equitable relief under Minn. Stat. § 317A.751, subd. 5(3-4), including failing to hold board meetings, failing to maintain meeting minutes, failing to keep financial records, and failing to have any individual perform the duties of a treasurer in violation of Minn. Stat. § 317A.305.
- b. Real Believers’ numerous unauthorized transfers as outlined above, including in violation of Minn. Stat. § 317A.255;
- c. Real Believers’ failure to respond to the AGO’s properly served CID containing reasonable written interrogatories, constituting grounds for equitable relief under Minn. Stat. § 317A.751, subd 5(11).
- d. Real Believers’ fraudulent solicitation of property, purportedly for charitable purposes, that was actually used for personal benefit, pursuant to Minn. Stat. § 317A.751, subd. (5)(13).

COUNT V
FAILURE TO REGISTER AND REPORT AS A SOLICITING CHARITABLE
ORGANIZATION
(LES JOLIES)

183. The State re-alleges all prior paragraphs of this Complaint.

197. Minn. Stat. § 309.50, subd. 4, provides:

“Charitable organization” means any person who engages in or purports to engage in solicitation for a charitable purpose and includes a chapter, branch, area office or similar affiliate or any person soliciting contributions within the state for a parent charitable organization, but does not include an organization whose primary purpose is supporting or opposing any candidate for elective office, or influencing the nomination for election or the election of any candidate for elective office.

198. Minn. Stat. § 309.52, subd. 1, provides that “[n]o charitable organization . . . shall solicit contributions from persons in this state by any means whatsoever unless, prior to any solicitation, there shall be on file with the attorney general upon forms provided by the attorney general, a registration statement[.]”

199. A charity’s registration ends on the day after it should—but failed to—file annual report. Minn. Stat. § 309.52, subd. 7.

200. Les Jolies is a nonprofit corporation that solicits donations. Les Jolies applied for grant funds, solicits donations on its website, hosts fundraisers, and charges tuition and fees.

201. Although Les Jolies' 2016 tax returns both claim over \$25,000 in revenue and Les Jolies' bank statements show an excess of \$1,315,000.00 in revenue, Les Jolies has not been registered with the AGO since July 15, 2008.

202. Les Jolies' conduct of engaging in solicitation without being registered with the AGO is a violation of Minn. Stat. § 309.52.

COUNT VI
FAILURE TO REGISTER AND REPORT AS A CHARITABLE TRUST
(ALTERNATIVE TO COUNT V)
(LES JOLIES)

203. The State re-alleges all prior paragraphs of this Complaint.

204. The Minnesota Supervision of Charitable Trusts and Trustee Act (“Charitable Trust Act”) is included in Minn. Stat. §§ 501B.36 to 501B.55.

205. Under the Charitable Trust Act, unless it is registered as a soliciting charitable organization or another exception applies, an “organization with a charitable purpose” that has “gross assets of \$25,000 or more at any time during the year” is required to register with the AGO as a charitable trust. Minn. Stat. § 501B.36.

206. The Charitable Trust Act defines “charitable purpose” as an actual or purported charitable, philanthropic, religious, social service, educational, eleemosynary, or other public use of purpose. Minn. Stat. § 501B.35, subd. 2.

207. Charitable trusts seeking to maintain their registration with the AGO must file an annual report and pay a fee each year. Minn. Stat. § 501B.38. A charity's registration on the day after it should have – but failed to – file its annual report.

208. Les Jolies has a charitable purpose “to operate as a nonprofit [e]ducational organization under Section 501c3 of the internal revenue code.”

209. For each year that Les Jolies was in existence it held charitable assets of over \$25,000. Les Jolies collected tens of thousands of dollars in grant money, in dance fees, and donations. Further, Les Jolies held title to 1106 W Broadway, Minneapolis.

210. For the years 1998 to 2025 Les Jolies failed to file annual reports and pay the fee as required by chapter 501B.

211. Les Jolies is not registered as a soliciting charitable organization and no other exception applies to the registration requirement. As such, even if Les Jolies was not required to register as a soliciting charitable organization under chapter 309 pursuant to Count V, it still was required to register as a Charitable Trust under chapter 501B.

212. Les Jolies’ failure of a trustee to register under section 501B.37 and to file annual reports under section 501B.38 constitutes multiple, separate breaches of trust.

RELIEF

WHEREFORE, Plaintiff State of Minnesota, by its Attorney General Keith Ellison, respectfully asks this Court to enter judgment against Les Jolies Petites School of Dance, Real Believers Faith Center, Sharon Cook, Larry Cook, Danyale Potts, Emily Neuhaus, Risheka Remus, Makada Williams, and Sunsearay Washington, awarding the following relief:

1. Declaring that Defendant Les Jolies Petites School of Dance, Defendant Real Believers Faith Center, Defendant Sharon Cook, Defendant Larry Cook, Defendant Danyale Potts, Defendant Emily Neuhaus, Defendant Risheka Remus, Defendant Makada Williams, and Defendant Sunsearay Washington’s acts and omissions as described in this Complaint constitute multiple, separate violations of Minn. Stat. ch. 317A;

2. Declaring that Defendant Les Jolies Petites School of Dance's acts and omissions as described in this Complaint constitute multiple, separate violations of Minn. Stat. ch. 309;
3. Declaring that Defendant Les Jolies Petites School of Dance, Defendant Sharon Cook, and Defendant Larry Cook's acts and omissions as described in this Complaint constitute multiple, separate violations of Minn. Stat. ch. 501B.
4. Declaring that the individual defendants are jointly and severally liable for their violations as set forth above;
5. Enjoining Defendant Les Jolies Petites School of Dance, Defendant Real Believers Faith Center, Defendant Sharon Cook, Defendant Larry Cook, Defendant Danyale Potts, Defendant Emily Neuhaus, Defendant Risheka Remus, Defendant Makada Williams, and Defendant Sunsearay Washington from engaging in unlawful conduct and further violations of Minn. Stat. chs. 317A, 309, and 501B;
6. Granting equitable remedies as necessary to protect charitable assets and the public interest, or as the Court deems just and appropriate or that is allowed under Minn. Stat. chs. 8, 317A, 309, 501B, or the common law, including the *parens patriae* doctrine; and the general equitable powers of this Court, as necessary to remedy the harm and injury from Defendants' acts and omissions described in this complaint.
7. Awarding monetary relief, including restitution, civil penalties, reasonable attorney fees, costs of investigation and litigation, and all other available legal and equitable monetary remedies pursuant to Minn. Stat. §§ 8.31; 309.57; 317A.751, subds. 1 and 5; 501B.41, subd. 7; and Minnesota common law, including the *parens patriae* doctrine; and the general equitable powers of this Court, as necessary to remedy the harm and

injury from Defendants' acts and omissions and to deter future misconduct as described in this Complaint.

8. Granting such further relief as provided for by law or equity, or as the Court deems appropriate and just.

Dated: April 2, 2026

Respectfully submitted,

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Attorney General
State of Minnesota

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ACKNOWLEDGMENT

The party on whose behalf the attached document is served acknowledges through its undersigned counsel that sanctions, including reasonable attorneys' fees and other expenses, may be awarded to the opposite party or parties pursuant to Minn. Stat. § 549.211 (2025).

Dated: April 2, 2026

/s/ Heather Caulkins
HEATHER CAULKINS
Assistant Attorney General