



CEASE AND DESIST ORDER

**Brooks Funeral Home
Mr. Sanders Moody
862 Concordia Ave.
St. Paul, Minnesota 55104**

I. AUTHORITY

Minnesota Statutes, Chapter 149A.08 (in relevant part) authorizes the Minnesota Department of Health (MDH) to issue a written cease and desist order to “...stop a person from violating or threatening to violate any law, rule, order, stipulation agreement, settlement, compliance agreement, license, or permit which the regulatory agency is empowered to regulate, enforce, or issue.” A Cease-and-Desist Order does not preclude the agency from pursuing other enforcement action authorized in Minnesota statutes, chapter 149A.

II. FINDINGS OF FACT

- Mr. George W. Brooks is the owner of Brooks Funeral Home, located at 862 Concordia Ave, Saint Paul, Minnesota 55104. Mr. Brooks was first licensed as a mortician on July 2, 1959. As of February 1, 2024, Mr. Brooks’ license status is “lapsed”. According to Department licensing records, Mr. Brooks is the sole owner of the funeral home. Mr. Sanders Moody is an employee of the funeral home. Mr. Sanders Moody is not a licensed mortician. Brooks Funeral Home has been a licensed funeral establishment since August 14, 1969. The funeral home’s establishment license lapsed July 31, 2024. Department staff received an application for renewal. However, given the incomplete CHOW application, and the lack of communication with Mr. Brooks about the CHOW application, the Department has not renewed the Brooks Funeral Home license. The Department is without clarity as to the identity of the intended funeral home operators and who is currently operating the funeral home. Due to these factors, the Department issued a Notice of Non-Renewal to the Brooks Funeral Home dated October 7, 2024. The Department attempted to provide the non-renewal to Brooks Funeral Home via certified mail on two separate occasions. On both occasions, the Brooks Funeral Home refused service, so the notice was sent via email on October 16, 2024.

- Mr. Brooks' mortician license expired December 31, 2023, and he applied for a renewal that same month. The Department has not issued a renewal license, since Mr. Brooks has not satisfactorily completed sufficient continuing education units (CEU) credits required for renewal. Therefore, Mr. Brooks' license lapsed on February 1, 2024. Importantly, Mr. Brooks remains nonresponsive to the Department's requests for information. Since December 2023, the Department has made multiple attempts to reach Mr. Brooks about his lapsed license and the CEU deficiency but has not received a response.
- In 2017, the Department worked with the Brooks Funeral Home and issued a letter which contained the following reminder regarding unlicensed practice: "If families are inquiring about any funeral related question pertaining to arrangements, scheduling services, and of what the law is, please make sure they are dealing with a licensed mortician only."
- Since 2020, the Department has received multiple complaints against the Brooks Funeral Home alleging unlicensed practice of mortuary science.
- On July 24, 2024, the Department issued a Cease-and-Desist Order to Mr. George Brooks. The Cease and Desist ordered Mr. George Brooks to ensure that Ms. Margaret Brooks immediately cease and desist from engaging in the unlicensed practice of mortuary science, such as arranging, directing, or supervising a funeral service, memorial, or gravesite service as an unlicensed person. Mr. Brooks did not respond to this Cease-and-Desist.
- Since July 24, 2024, when the Cease-and-Desist Order was issued to Mr. George Brooks, the Department has identified additional instances of unlicensed practice of mortuary science by a second employee, Mr. Sanders Moody.
- On August 14, 2024, the Department interviewed a former employee, "Employee A" about the daily operations at Brooks Funeral Home. Employee "A" was employed from Spring 2020 through November 2023.
- During the Department's interview on August 14, 2024, Employee "A" stated that shortly prior to leaving employment at Brooks Funeral Home, Ms. Margaret Brooks hired two unlicensed individuals to help at the funeral home in anticipation that Employee "A" would be leaving. Employee "A" stated that they were friends of Ms. Margaret Brooks. According to Employee "A" neither had a license to practice mortuary science. Employee "A" stated the two new employees would help at funerals and assist in cosmetizing and dressing human remains. Employee "A" informed the Department that Ms. Margaret Brooks' son, Mr. Sanders Moody, Employee "B", also assists Ms. Margaret Brooks at funerals and often helps prepare bodies by dressing them (putting on clothes, positioning the face, applying cosmetics, applying or removing jewelry, adjusting the body) and casketing (placing the body in the casket). Mr. Sanders Moody also does not hold a license to practice mortuary science.
- On August 14, 2024, the Department interviewed "Employee C" about their participation with Brooks Funeral Home. Employee "C" shared that they are considered a trade service and are available to Brooks Funeral Home on an "on-call" basis to complete removals, arrangements and preparation of human remains.

- On May 28, 2025, the Department conducted a second interview with Employee “C”. During the interview, the Department asked Employee “C” if they are present at funeral services. Employee “C” provided details as to how Brooks Funeral Home operates logistically at funeral services. Employee “C” was also asked about their presence at funeral services.

Employee “C” stated that Ms. Margaret Brooks and Mr. Sanders Moody routinely set up the church and meet Employee “C” there. Employee C reported that Ms. Margaret Brooks is the primary coordinator at the church and routinely directs the service with Mr. Sanders Moody’s assistance. Employee “C” explained their role as an observer, to make sure things are done accordingly. Employee “C” stated that Ms. Margaret Brooks is the face of the funeral home and that she conducts the service with Mr. Sanders Moody’s assistance. Employee “C” explained they are present at the funeral services but stated “I don’t like to say I’m in charge, so I like to kind of just observe”. “It’s just the rapport, I feel like I’m an outsider so I’m there to just make sure it’s done proper and right, but they do it very well”.

- On May 28, 2025, during the interview, the Department asked Employee “C” who embalms and prepares human remains for Brooks Funeral Home. Employee “C” stated embalming is completed off site but stated that bodies are transported back to Brooks Funeral Home where Mr. Sanders Moody physically helps Employee “C” dress, cosmetize, and casket the decedents.
- Since the July 24, 2024, Cease and Desist Order was issued to Mr. Brooks, the Department viewed videos and photographs of funeral services that shows Sanders Moody’s involvement in funeral services.

Video one captures Ms. Margaret Brooks during a service on September 11, 2024, leading service and closing the decedent’s casket, arranging flowers, and adjusting the floral bouquet on top of the decedent’s casket prior to the start of the service. Ms. Margaret Brooks engages Mr. Sanders Moody’s assistance during the closing of the casket. In the video a family member at the podium asks Ms. Margaret Brooks if she is ready for him to begin the service. Video two captures Ms. Margaret Brooks on or around October 4, 2024, conducting a service for a decedent at Brooks Funeral Home. Ms. Margaret Brooks can be seen organizing and instructing the attendees, circulating service programs, providing instruction to clergy, and providing guidance to family near casket at conclusion of service. Based on these behaviors, Ms. Margaret Brooks is representing herself as authoritative figure directing the service. Mr. Sanders Moody is seen in video assisting Ms. Margaret Brooks with logistics prior to the start and conclusion of the service. For example, Mr. Sanders Moody can be seen providing technical support for the sound system, attending to service participants and service attendees. The Department is unclear as to whether Employee C was at this service, but in the video, Employee “C” is not seen near Ms. Margaret Brooks or Mr. Sanders Moody. This coincides with the information Employee “C” provided during interviews with the Department.

- A series of progressive screen shots from a third service captures Ms. Margaret Brooks on or around February 9, 2025, gathering personal belongings, instructing Mr. Sanders Moody, and directing the funeral service recessional. Mr. Sanders Moody is captured assisting Ms. Margaret Brooks with the casket and organizing and leading the recessional at the conclusion of the funeral service. Mr. Sanders Moody can be seen positioning the casket and leading the formal exit of the casket out of the church at the end of the service. Mr. Sanders Moody can also be seen pushing the casket in the recessional. Photos show Employee “C” observing from the back of the church. This coincides with the prior videos the Department viewed and information provided by Employee “C” during Department interviews.

- To conclude, during the Department's investigation, the Department captured evidence in the form of interviews, videos and screenshots demonstrating that Mr. Sanders Moody, an unlicensed staff person, has practiced unlicensed mortuary science while employed at the Brooks Funeral Home. Since the Department obtained copies of video and photos referenced above, Brooks Funeral Home has removed all service videos from its website and social media platforms.

III. CONCLUSION

Under Minnesota Statutes, section 149A.01, subdivisions 1 and 2, body preparation and directing funeral services can only be performed by a person licensed by the commissioner of health or who fits into an exception identified in Minnesota Statutes, section 149A.01, subdivision 3.

Under Minnesota Statutes, section 149A.02, subdivision 34, "preparation of the body" means "...placement of the body into an appropriate cremation or alkaline hydrolysis container, embalming of the body or such items of care such as washing, disinfecting, shaving, positioning of facial features, restorative procedures, application of cosmetics,, dressing, and casketing."

Under Minnesota Statutes, section 149A.70, subdivision 6, Brooks Funeral Home may employ unlicensed staff, but unlicensed staff may not "...perform the duties of a funeral director or mortician."

Based on the above facts above, including the statements made by Employee "A" and Employee "C" during interviews with the Department, the Department concludes that Mr. Sanders Moody has engaged in unlicensed practice of mortuary science by preparing a body, which can only be performed by a licensed mortician. Mr. Moody has directly helped prepare deceased human bodies for a funeral by dressing, cosmetizing, and casketing them.

Ms. Sanders Moody also participated in unlicensed activity by taking direction from Ms. Margaret Brooks to lead a recessional, position a casket, and help with logistics during a service. Although Employee C, as a licensed mortician, was attending the funeral services, interviews, videos, and screen shots do not support Employee C as having an active supervisory or oversight role in the funeral services. Moreover, Employee C described themselves as an 'observer,' supporting a passive role and bolstering the Department's conclusion that Mr. Sanders Moody's participation in funeral services was not at the direction or supervision of a licensed mortician. A funeral home may, if it chooses, employ unlicensed personnel, but it cannot use them in lieu of a licensed mortician. The mere presence of a licensed mortician at a funeral service does not insulate Mr. Moody's actions from unlicensed practice.

Minnesota Statutes, section 149A.70, subdivision 3 states, in relevant part, "...[a]ny advertising or other printed material that contains the names or pictures of persons affiliated with a funeral establishment, alkaline hydrolysis facility, crematory...shall state the position held by the persons and shall identify each person who is licensed or unlicensed under this chapter."

As recently as October 28, 2025, the Brooks Funeral Home website identified Sanders Moody by name along with a picture but did not identify his role or title as required by statute. Given Sanders Moody's heavy involvement at funeral services and the direction he has taken from Ms. Margaret Brooks (also an unlicensed person), the Department is concerned that the vagueness and lack of clarity as to Sanders Moody's role risks misleading the public about his credentials.

IV. ORDER

IT IS HEREBY ORDERED THAT Mr. Sanders Moody immediately cease and desist from engaging in unlicensed activity in violation of Minnesota Statutes, Chapter 149A. Mr. Sanders Moody must immediately cease and desist from the preparation of human remains, which includes cosmetizing or dressing human remains, and casketing. Mr. Sanders Moody must immediately take steps to ensure that his participation at funeral services (i.e. such as closing the casket and leading a funeral recession) only occur at the direction and direct supervision of a licensed mortician.

The issuance of this order does not preclude the commissioner from pursuing any other enforcement action available to MDH authorized under statute or rule.

Under Minnesota statutes, section 149A.08 subdivision 2, an individual who has been issued a cease-and-desist order may request a hearing under Minnesota statutes, sections 14.57-14.62. Under Minnesota statutes, section 149A.08 subdivision 3, requests for a hearing must be in writing, specifically state the reasons review of the order is sought and must be delivered to MDH via certified mail within twenty (20) calendar days of receipt of the cease-and-desist order.

Requests for a hearing shall be directed to the following:

Minnesota Department of Health
Appeals and Reconsiderations Unit
Health Regulation Division
P.O. Box 64970
85 East Seventh Place
St. Paul, MN 55164-0970

Additional questions may be directed to: health.mortsci@state.mn.us.

SO ORDERED this _____

Maria King,
Division Director | Health Regulation Division