

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Minnesota Board of Private Detective and
Protective Agent Services,Case Type: Other Civil
(Injunctive Relief)

Plaintiff,

Court File No. _____

vs.

SUMMONSMen in Black Security, LLC,
Ulitdareese Lyneal Carothers, and
Rashaud Imaun.

Defendants.

THIS SUMMONS IS DIRECTED TO MEN IN BLACK SECURITY, LLC.

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a **written response** called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at: 445 Minnesota Street, Suite 1400, St. Paul, Minnesota 55101-2131.

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS**

SUMMONS. If you do not Answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the Plaintiff everything asked for in the complaint. If you do not want to contest the claims stated in the complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.**

6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

Dated: November 8, 2023

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ Stephen D. Melchionne
STEPHEN D. MELCHIONNE
Assistant Attorney General
Atty. Reg. No. 0391374

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ATTORNEYS FOR PLAINTIFF

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Plaintiff,

Court File No. _____

vs.

SUMMONSMen in Black Security, LLC,
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Rashaud Imaun.

Defendants.

THIS SUMMONS IS DIRECTED TO ULITDAREESE LYNEAL CAROTHERS.

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

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Plaintiff,

Court File No. _____

vs.

SUMMONSMen in Black Security, LLC,
Ulitdareese Lyneal Carothers, and
Rashaud Imaun.

Defendants.

THIS SUMMONS IS DIRECTED TO RASHAUD IMAUN.

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

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Plaintiff,

Court File No. _____

vs.

COMPLAINTMen in Black Security, LLC,
Ulitdareese Lyneal Carothers, and
Rashaud Imaun.

Defendants.

Plaintiff Minnesota Board of Private Detective and Protective Agent Services, for its complaint against Defendants Men in Black Security, LLC, Ulitdareese Lyneal Carothers, and Rashaud Imaun, states and alleges as follows:

INTRODUCTION AND PARTIES

1. Plaintiff Minnesota Board of Private Detective and Protective Agent Services is empowered to regulate and enforce the laws relating to protective agents in Minnesota. Minn. Stat. § 326.3311(4) (2022).

2. The Board may bring an action in district court for “injunctive relief to restrain any unauthorized practice or violation or threatened violation of any statute or rule which the board is empowered to regulate or enforce.” Minn. Stat. § 214.11 (2022).

3. Men in Black Security, LLC, d/b/a Men in Black De-Escalation Specialists, is a limited liability company registered with the Minnesota Secretary of State. Men in Black Security’s principal and registered addresses are both in Hennepin County, Minnesota.

4. Ulitdareese Lyneal Carothers is the owner, manager, and chief executive officer of Men in Black Security. Carothers resides in Hennepin County, Minnesota.

5. Rashaud Imaun is the chief business officer of Men in Black Security. Imaun resides in Hennepin County, Minnesota.

6. Defendants are not licensed as protective agents in Minnesota, either individually or corporately. Men in Black Security applied for a corporate protective agent licensed in 2021, but the Board denied the application.

7. Despite the license denial, Defendants continue to advertise and provide protective agent services in Minnesota without licensure.

8. The Board seeks injunctive relief restraining Defendants from advertising for, or performing, protective agent services in Minnesota. The Board also seeks to enforce Defendants' compliance with Minnesota law.

JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction over the claims asserted under to Minn. Stat. §§ 214.11 and 484.01 (2022).

10. This Court has personal jurisdiction over Defendants, and this matter is properly venued in Hennepin County under Minn. Stat. §§ 214.11 and 542.09 (2022) as the cause of action arose in Hennepin County, and Defendants all reside in Hennepin County.

FACTUAL BACKGROUND

11. In February 2021, Men in Black Security applied to the Board for a corporate protective agent license. At that time, Men in Black Security identified Carothers as the owner, manager, and sole officer of the company.

12. The Board's Licensing Committee recommended denying it because Carothers was statutorily disqualified from acting as or being licensed as a protective agent in Minnesota based on his past conviction for illegally possessing a pistol.¹ Minn. Stat. 326.3381, subd. 3(1)(ii).

13. Following a contested case hearing on the matter, an administrative law judge recommended denying the license application due to Carothers's criminal conviction. In February of 2022, the Board adopted the recommendation and denied Men in Black Security's application. Men in Black Security did not appeal the license denial.

14. Despite being denied a protective agent license, Defendants continue to offer and perform protective agent services in Minnesota.

Providing or Advertising Services Offline

15. Men in Black Security has been observed providing or advertising protective agent services in and about the Twin Cities. Men in Black Security has been providing these services at least as early as 2021 and continues to do so into 2023.

16. On or about October 16, 2021, Men in Black Security provided protective agent services for an event at Bethel University in Arden Hills, Minnesota. The Men in Black Security employees were wearing tactical gear, including tactical vests with "MIB Security" printed on them. The employees were armed and carried handcuffs. This was while Men in Black Security's protective agent license application was still pending before the Board.

¹ When a business entity applies for a private detective or protective agent license, "one member of that corporation or partnership must meet the licensing requirements in sections 326.32 to 326.339." Minn. Stat. § 326.3381, subd 4 (2022). Men in Black Security identified Carothers as its only member.

17. Men in Black Security continues to advertise for services into 2023, including on a truck (pictured below) with “M.I.B. Security” on the side along with the image of a fist and the slogan “To Protect & Preserve.”



18. On March 13, 2023, Men in Black Security made a presentation to the Brooklyn Park City Council, seeking a \$650,000 contract for “de-escalation” services. Among others, Imaun and Carothers presented on behalf of Men in Black Security. The city council voted to award that contract to Men in Black Security.

19. On or about March 23, 2023, a Men in Black Security employee was observed providing armed protective agent services outside of a Family Dollar store in Minneapolis. The employee was wearing clothing with the word “security” printed on it. The employee was also carrying a high-capacity firearm in what appeared to be a shoulder sling.

Men in Black Security’s Social Media

20. Since registering with the Secretary of State in 2021, Men in Black Security has used, and continues to use, its social media platforms to hire protective agents and advertise protective agent services. These posts started and have continued despite the company’s lack of licensure to provide the advertised services.

21. On its Facebook page, Men in Black Security made the following posts in 2021 offering employment as a protective agent. These posts reflect that Men in Black Security was available for and was in fact providing protective agent services in 2021.

- a. “MIB Security is seeking security guards for locations across the metro.” The role would include “[p]atrolling and monitoring activities on the company’s premises regularly to discourage criminals and ensure the environment is safe and secure. . . [e]victing trespassers and violators and detaining perpetrators. . . [c]ontrolling the entrance and departure of employees, visitors, and vehicles. . . .” (April 4, 2021)
- b. “MIB Security is seeking officers. . . .” Men in Black advertised that officers’ tasks included: “secur[ing] premises and personnel. . . [p]reventing losses and damage by reporting irregularities, informing violators of policies and procedures, restraining trespassers, . . . [e]nsuring the security, safety and well-being of all personnel, visitors and the premises, . . . [r]espond[ing] to emergencies, . . . [p]rotect the company’s assets . . . fire prevention, property patrol, traffic control and accident investigations.” (April 4, 2021)
- c. “Seeking security officer for local school. 7:30am-4:30pm. Mon-Fri.” (April 27, 2021)
- d. “Seeking individuals with CCW² to work 2-10pm shift!” (May 2, 2021)
- e. “Seeking Armed Guard for 1pm-10pm role!” (June 5, 2021)

² CCW stands for Conceal Carry Weapon permit. Minnesota does not have a CCW permit process but has a permit-to-carry process. Minn. Stat. § 624.714 (2022). Obtaining a permit to carry a pistol does not qualify an individual to carry that weapon while working as a protective agent without additional training, as prescribed by the Board. Minn. Stat. § 326.3361, subd. 3 (2022).

f. “Be a part of an ever evolving security company” The photo accompanying this post shows an individual wearing a tactical vest with the words “MIB Security”, a badge and firearm. (June 10, 2021)

22. Men in Black Security’s posts in 2022 are even more explicit that it was providing protective agent services.

23. On April 10, 2022, Men in Black Security posted, in relation to an incident involving a gunman: “MPD³ decided to inquire about the validity of one of our worker’s firearm and even scrutinized another for having a non-lethal tool.”

24. A post from June 20, 2022, shows Men in Black Security employees, including Carothers (right) and Imaun (center), wearing and carrying full security gear, including tactical vests and t-shirts with “security” printed on them, radios, badges, and firearms.



³ This presumably references an officer in the Minneapolis Police Department.

25. The unlicensed work continued into 2022. Between August and October 2022, Men in Black Security made at least eighteen social-media posts offering protective agent services. Some of these posts were accompanied by stock photos of law enforcement or protective agents and some showed photos of actual Men in Black Security employees. These posts provided Men in Black Security's contact information and often included the following hashtags: #Security #violenceprevention #deescalation specialists #safety #protection #securityguard #bodyguard #securityofficer #securityservices #securitycompany #securityforces.

26. Men in Black Security has also posted customers reviews, indicating that it was engaging in the business of a protective agent. For example, on October 28, 2022, Men in Black Security posted, "[w]hen you choose Men in Black Security, you can rest assured that you make the best choice for your safety and security." This post included a review from apparent client "Jammin Wings": "You guys have changed the definition of what security and protection look like. Very respectful but FIRM with my patrons...that's good for business." The post also has the hashtags referenced in paragraph 6.

27. Men in Black Security reproduced many of these posts, in substantially similar language and form, on its Instagram and Twitter pages.

Men in Black Security's Website

28. Men in Black Security has operated and continues to operate a website, *www.mibsecurityco.com*, that advertises and offers protective agent services.

29. Until April 2023, the website explicitly offered "security" services. The "Home" page for the website contained the logo "M.I.B. Security" and the motto "To Protect and Preserve."

30. On the “About” page of the website, under a title “WHAT WE OFFER,” Men in Black Security offered the following services: “non lethal[sic]/armed security,” “commercial security,” “residential security,” “night club/event security,” “personal security escorts,” and “business patrols.”

31. Several statements on the “About” page indicated that Men in Black Security is providing protective agent services and that its employees will use force to accomplish those goals, including:

- a. “When they push, we pull, when they go high we stand firm. Being a de-escalation specialist is about *preserving the lives* of ALL of the parties involved...including the aggressor.” (Emphasis added)
- b. “This ideology is also followed by many military branches when it comes to rules of engagement. We see an objective and we complete our objective with zero to *few casualties as possible*.” (Emphasis added)
- c. “We lead with de-escalation through communication. Our confidence and training grounds us in *the ability to kick up dust, if necessary*. However, we’d rather our patrons go home unscathed.” (Emphasis added)

32. The “Services” page of the website stated that the company was “For Hire” to provide “all levels of security consultation along with a calm and assertive experience for commercial properties.”

33. Men in Black Security described its services as “details” and provided a brief summary the services provided:

- a. For “residential detail,” the website stated “[w]e not only secure the facility, but we take responsibility for the immediate surrounding area as well. We provide THE COMMUNITY with their security needs.”
- b. The “personal detail” section stated that “we provide professional person [sic] protection.”

34. The request-for-services form on the website, asked “How many agents are you requesting?” and “What type of security detail are you requesting?” The latter question had three options: Armed, Soft Armed, Unarmed.

Media Attention and Website Modifications

35. On April 14, 2023, KSTP published an article that Men in Black Security had been awarded the Brooklyn Park contract discussed above. The article reported that Men in Black Security was offering various security services on its website despite not being licensed with the Board.

36. On the same day that KSTP posted its article and aired its report, Men in Black Security posted about the KSTP article on its Facebook page. Around that same time, Men in Black Security began modifying its website to remove the term “security” and other references.

37. The website modifications were superficial and have not altered the services Men in Black is offering or performing. For example, instead of offering “non lethal/armed security” the website offered “non lethal/armed services.”

38. On the “Services” page, in the “Personal Detail” section, Men in Black Security removed the reference to personal security but still showed a picture of an individual wearing a tactical vest with the words “MIB Security” on it and carrying a badge and firearm.

39. On April 17, Men in Black Security registered the assumed name “Men in Black De-Escalation Specialists” with the Minnesota Secretary of State. The legal name of the company remains “Men in Black Security, LLC” and its website is mibsecurityco.com.

40. Carothers and Imaun provided an interview to CCX Media that was published on Tuesday, April 18. During the interview, Carothers and Imaun wore attire with “M.I.B. Security” printed on it. Carothers stated that “the actual people who we interact with, they have already experienced our services.” According to the report, Carothers and Imaun admitted that their employees carry lethal weapons if a client requests it. Carothers incorrectly indicated that the services Men in Black Security provides do not require licensure.

41. Men in Black Security again modified its website to emphasize its services as “de-escalation.” The website still offered protective agent services, but identifies those services as “violence prevention,” “consulting,” and “first response.” The website claims that Men in Black Security’s employees are “successful at interrupting violence” and shows multiple pictures of personnel wearing tactical gear and weapons, including firearms.

The Board’s Contact with Men in Black

42. The Board has attempted to resolve this matter without seeking an injunction.

43. Despite correspondence spanning several months, the Board and Men in Black Security were unable to resolve the matter. Men in Black Security continued to assert, including in a letter on August 8, that Men in Black Security has not been providing protective agent services.

44. Despite these assertions, Men in Black Security has continued to provide protective agent services, including just days after telling the Board it was not. On August 12,

Men in Black Security provided protective-agent services in Robbinsdale, as photographed below. The picture shows two Men in Black Security personnel who appear to be armed.⁴



45. On August 25, the Board served Men in Black Security with an administrative subpoena seeking information regarding Men in Black Security's contracts and other protective agent related activities in Minnesota. Among those requests were for Men in Black Security to identify all equipment, including firearms, that Men in Black Security issues to its personnel.

⁴Men in Black Security has asserted that the personnel in the picture above were only carrying pepper spray. Carrying of any weapon, including chemical irritants, indicates that the personnel

The deadline for responding to the subpoena was September 8, which was later extended to September 15.

46. To date, Men in Black has not provided the information demanded by the administrative subpoena.

47. Men in Black Security has been observed providing security services in multiple locations in Minneapolis as recently as October 2023.

**COUNT I
ACTING AS A PROTECTIVE AGENT WITHOUT A LICENSE**

48. The preceding paragraphs are incorporated herein as though set forth in full.

49. Under Minn. Stat. § 326.3381, subd. 1 (2022), it is unlawful for any person to engage in the business of a protective agent “or advertise or indicate in any verbal statement or in written material that the person is so engaged or available to supply those services, without having first obtained a license. . . .”

50. A person is engaging in the business of a protective agent if that person, for a fee, reward, or other valuable consideration undertakes any of the following acts:

(1) providing guards, private patrol, or other security personnel to protect persons or their property or to prevent the theft, unlawful taking of goods, merchandise, or money, or to prevent the misappropriation or concealment of goods, merchandise, money, or other valuable things, or to procure the return of those things;

(2) physically responding to any alarm signal device, burglar alarm, television camera, still camera, or a mechanical or electronic device installed or used to prevent or detect burglary, theft, shoplifting, pilferage, losses, or other security measures;

...

(5) providing management and control of crowds for the purpose of safety and protection.

Minn. Stat. § 326.338, subd. 4 (1), (2), and (5) (2022).

are performing protective agent work.

51. Defendants have engaged in the business of a protective agent without being licensed as a protective agent in violation of Minn. Stat. § 326.3381, subd. 1.

52. Defendants have advertised or indicated in a verbal statement or in written material that they are engaged in the business of a protective agent without being licensed as a protective agent in violation of Minn. Stat. § 326.3381, subd. 1.

53. Defendants have advertised or indicated in a verbal statement or in written material that they are available to supply protective agent services without being licensed as a protective agent in violation of Minn. Stat. § 326.3381, subd. 1.

RELIEF

WHEREFORE, under Minn. Stat. §§ 214.11 and 332.59, Plaintiff prays that the Court issue an order and award judgment against Men in Black Security, LLC, Ulitdareese Lyneal Carothers, and Rashaud Imaun as follows:

1. Declaring the Defendants violated Minn. Stat. § 326.3381, subd. 1, by engaging in the business of a protective agent, advertising and indicating in verbal statements and written material that Defendants are so engaged or are available to supply the services of a protective agent, without first obtaining a license to do so;

2. Enjoining the Defendants and any business owned or operated by Defendants from engaging in the business of a protective agent, unless and until they are properly licensed by the Board;

3. Enjoining the Defendants and any business owned or operated by Defendants from advertising protective agent services, unless and until they are properly licensed by the Board;

4. Enjoining the Defendants and any business owned or operated by Defendants from offering to perform protective agent services, unless and until they are properly licensed by the Board;

5. Ordering Defendants to take down the websites *www.mibsecurityco.com*, *https://m.facebook.com/people/MIB-Security-Co/100064062064106/*, *https://www.instagram.com/mibsecurityco/*, *https://twitter.com/MIBSecurityCo*, and any other similar websites or pages, or to conspicuously state on each page of the websites (or any similar website that Defendants may create or use in the future), “Men in Black Security, LLC is not licensed as a protective agent in Minnesota and may not provide protective agent services in Minnesota,” or substantially similar language, unless and until Men in Black is licensed as a protective agent corporation in Minnesota;

6. Granting such further and other relief as the Court deems just and proper.

Dated: November 8, 2023

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/ Stephen D. Melchionne

STEPHEN D. MELCHIONNE

Assistant Attorney General
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ATTORNEYS FOR PLAINTIFF

MINN. STAT. § 549.211**ACKNOWLEDGMENT**

The party on whose behalf the attached document is served acknowledges through its undersigned counsel that sanctions, including reasonable attorney fees and other expenses, may be awarded to the opposite party or parties pursuant to Minn. Stat. § 549.211 (2022).

Dated: November 8, 2023

/s/ Stephen D. Melchionne
STEPHEN D. MELCHIONNE
Assistant Attorney General
Atty. Reg. No. 0391374

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