STATE OF MINNESOTA BOARD OF ACCOUNTANCY

In the Matter of the CPA Certificate of

STIPULATION AND CONSENT ORDER

Heather Lynn Favre CPA Certificate No. 22064

Board File No. 2025-083

STIPULATION

Heather Favre ("Respondent") and the Minnesota Board of Accountancy's Complaint Committee stipulate that, subject to Board's review and discretionary approval, the Board may issue a consent order that imposes the following sanctions:

- A. Respondent shall pay to the Board a CIVIL PENALTY of \$250. Respondent shall submit the civil penalty by check to the Board within 60 days of the Board's approval of this Stipulation and Consent Order.
- B. Respondent shall comply with all statutes and rules within the Board's jurisdiction.

 See Minn. Stat. ch. 326A (2024) and Minn. R. ch. 1105 (2023).
- C. Respondent shall report in writing within ten days any violations of this stipulation and consent order to the Board's Executive Director.

Respondent and the Committee enter into this stipulation based on the following findings of fact, conclusions of law, and other stipulated provisions:

Findings of Fact

- 1. The Board issued Respondent a CPA certificate on August 22, 2003.
- 2. The Board selected Respondent for audit of their continuing education ("CPE") records for the three-year period ending June 30, 2024.
- 3. Respondent was notified via letter on March 18, 2025, that they had been selected and that the CPE audit documentation was due no later than April 8, 2025.
- 4. Respondent requested an extension to submit the CPE audit documentation upon receipt of the letter and it was granted till April 28, 2025.
- 5. Respondent submitted their CPE audit documentation on April 23, 2025, before the extension date.
- 6. Respondent previously reported 49, including 5 ethics, hours for CPE reporting year 2022 but was only able to verify 45.5, including 2.5 ethics, hours. As a result, Respondent was short 1 of the required 8 ethics hours for the three years ended June 30, 2022.
- 7. Respondent previously reported 27 hours for CPE reporting year 2023 and was able to verify the same with the audit. As a result of the CPE reporting year 2022 not being fully verified, Respondent was short .5 of the required 120 hours for the three-years ended June 30, 2023.
 - 8. Respondent was notified of the deficiencies found in the audit on May 20, 2025.
- 9. Respondent submitted additional documentation for CPE courses that were not previously reported with any renewals and those hours were added to the CPE totals on June 6, 2025.

- 10. With the additional, not previously reported hours, Respondent was in compliance with the CPE requirements for all three CPE reporting years under review.
- Although they submitted additional hours that were not previously reported, Respondent still reported hours on their renewals that they were unable to verify. Therefore, Respondent submitted false information for their CPE for the CPE reporting years 2022 and 2023, with their 2023, 2024, and 2025 renewals by affirming on those renewals that they had completed the CPE hours, and such hours complied with the 1-year and rolling 3-year CPE requirements.

Conclusions of Law

- 1. The Board has authority to license and regulate certified public accountants and to take disciplinary action as appropriate. Minn. Stat. ch. 326A (2024).
- 2. Respondent violated Minn. Stat. § 326A.04, subd. 4 (2024) and Minn. R. 1105.3000(A)(1), (2), (3), and (E), 1105.3100, subp. 4(F), 1105.3200(A), (B) and (C), 1105.5600, subp. 1(A), (C)(5), and 1105.7800(A) and (B) (2023).
- 3. Respondent is subject to discipline pursuant to Minn. Stat. §§ 326A.08, subd. 5(a)(1), (5), and (8), and 7 (2024).
 - 4. This stipulation and consent order is in the public interest.

Other Stipulated Provisions

1. This stipulation and consent order must be approved by the Board to become effective.

- 2. Respondent agrees that the Committee may move the Board *ex parte*, with or without advance notice to the Respondent, to approve this stipulation and consent order. Respondent understands that the Board may either approve the stipulation and consent order or not approve it. This stipulation and the files, records, and proceedings associated with this matter may be reviewed by the Board in its consideration of the Committee's motion.
- 3. If approved by the Board, this stipulation and consent order shall be classified as public data. Minn. Stat. § 13.41, subd. 5 (2024).
- 4. If the Board does not approve this stipulation and consent order, then the matter remains unresolved and the Committee may either seek to negotiate a revised stipulation and consent order with Respondent to present to the Board or issue an order commencing a contested-case hearing before an Administrative Law Judge at the Office of Administrative Hearings. *See* Minn. Stat. §§ 14.57–.62, 214.10, subd. 2 (2024) (describing administrative hearing process).
- 5. Respondent agrees that if this case comes before the Board again after it reviews and discusses this stipulation and consent order, Respondent waives any claim that the Board was prejudiced by its review and discussion of this stipulation and consent order and any records relating to it.
- 6. Respondent acknowledges that they were advised by the Committee of their right to a contested-case hearing in this matter before an Administrative Law Judge, to file exceptions and make argument to the Board after the hearing, and to seek judicial review from any adverse decision rendered by the Board. Respondent hereby expressly waives those rights. Respondent

was further advised by the Committee of their right to be represented by counsel and that they knowingly waive that right.

- 7. Respondent has read, understands, and agrees to this stipulation and has voluntarily signed it. It is expressly understood that this stipulation contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise. If approved by the Board, a copy of the final stipulation and consent order shall be served personally or by first class mail on Respondent. The Board's order shall be effective when it is signed by the Chair of the Board or the Chair's designee.
- 8. Pursuant to Minn. Stat. § 16D.13 (2024), any civil penalty imposed by this stipulation and consent order shall begin to accrue simple interest in accordance with that section thirty days after the civil penalty is due. Pursuant to Minn. Stat. § 16D.17 (2024), thirty days after any civil penalty imposed by this stipulation and consent order is due, the Board may file and enforce any unpaid portion of the civil penalty as a judgment against Respondent in district court without further notice or additional proceedings.

Heather Lynn Favre, CPA

STATE OF Minnesota

This instrument was acknowledged before me on 4119/25 by Heath

(stamp)



(Signature of notary officer)

My commission expires: Jan 31, 2028

COMPLAINT COMMITTEE

ANN ETTER, CPA

Chair

CONSENT ORDER

Upon consideration of this stipulation and consent order, and based upon all the files, records, and proceedings herein, all terms of the stipulation and consent order are approved.

Accordingly, the Board hereby ADOPTS the stipulation and issues the ORDER described above.

STATE OF MINNESOTA

BOARD OF ACCOUNTANCY

Dated: Cotobar 8 , 2025

CHARLES SELCER, CPA

Board Chair