

STATE OF MINNESOTA
BOARD OF ARCHITECTURE, ENGINEERING, LAND SURVEYING, LANDSCAPE ARCHITECTURE,
GEOSCIENCE AND INTERIOR DESIGN

In the Matter of

**SETTLEMENT AGREEMENT AND
CEASE AND DESIST ORDER**

Paul Dotson
Unlicensed

Board File No. 2025-0104

STIPULATION

Paul Dotson (“Respondent”) and the Minnesota Board of Architecture, Engineering, Land Surveying, Landscape Architecture, Geoscience and Interior Design’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 \$2,000. Respondent shall submit the civil penalty by check to the Board within 60 days of the Board’s approval of this Settlement Agreement and Cease and Desist Order.

B. Respondent shall cease and desist from practicing as an Architect, Professional Engineer, or Certified Interior Designer in Minnesota until such time as he becomes licensed as such in the State of Minnesota.

C. Respondent shall comply with all statutes and rules within the Board’s jurisdiction. *See Minn. Stat. §§ 326.02–.15 (Supp. 2025) and Minn. R. chs. 1800 & 1805 (2023).*

D. Respondent shall report in writing within ten days any and all violations of this Settlement Agreement and Cease and Desist Order to the Board’s Executive Director.

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

Findings of Fact

1. Respondent is not now, nor has he ever been, licensed in one of the professions under the Board's jurisdiction.

2. Respondent was employed by a public entity where he worked as the Construction Contracts Procurement Manager for a multibillion-dollar project.

3. Respondent published Addendum 3 for the project on April 8, 2024, and Addendum 4 on May 1, 2024, to an online platform to facilitate the bidding process.

4. Respondent received a certification page that included signatures and certifications for the Addenda, but Respondent believed that they did not meet the format requirements for publishing. Respondent informed the firms of this and requested they be properly formatted, but did not receive a timely response.

5. Respondent placed the design professionals' signatures and certifications into the public entity's addendum format by copying them from Addenda specifications and drawings. Respondent did not alter the template language and therefore two Architects were mistakenly identified as Professional Engineers.

- a. The Addenda included the following language at the top of the page: "I hereby certify that this Addendum to the Bidding Documents for subject project was prepared by me or under my direct supervision and that I am a duly registered or certified professional under the laws of the State of Minnesota."

- b. Their signatures, names, license numbers, and what sections they were responsible for were included below.

6. The Addenda were not reviewed until the Engineering Manager, Principal Project Manager, and Project Director were informed by a representative from an architecture and engineering firm upon downloading Addendum 4 on May 2, 2024.

7. The bid opening proceeded on May 7, 2024.

8. Following these actions, Respondent's employment was suspended and ultimately terminated.

Conclusions of Law

1. The Board has authority to license and regulate the professions under its jurisdiction and to take disciplinary action as appropriate. Minn. Stat. § 326.111 (Supp. 2025).

2. Respondent violated Minn. Stat. § 326.15 (2024).

3. Respondent is subject to discipline pursuant to Minn. Stat. § 326.111 subds. 3 and 6 (Supp. 2025).

4. This Settlement Agreement and Cease and Desist Order is in the public interest.

Other Stipulated Provisions

1. This Settlement Agreement and Cease and Desist 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 Settlement Agreement and Cease and Desist Order. Respondent understands that the Board may either approve the Settlement

Agreement and Cease and Desist Order or not approve it. This settlement agreement 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 Settlement Agreement and Cease and Desist Order shall be classified as public data. Minn. Stat. § 13.41, subd. 5 (2024). The Board will post a copy of this order on its website. The Board will also send a summary to the national discipline data bank pertaining to the practice of professional engineering and architecture, if applicable.

4. If the Board does not approve this Settlement Agreement and Cease and Desist Order, then the matter remains unresolved and the Committee may either seek to negotiate a revised Settlement Agreement and Cease and Desist Order with Respondent to present to the Board or issue an order commencing a contested-case hearing before an Administrative Law Judge at the Court 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 Settlement Agreement and Cease and Desist Order, Respondent waives any claim that Respondent or the Board were prejudiced by its review and discussion of this Settlement Agreement and Cease and Desist 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 settlement agreement and has voluntarily signed it. It is expressly understood that this settlement agreement 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 Settlement Agreement and Cease and Desist 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 Settlement Agreement and Cease and Desist 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 Settlement Agreement and Cease and Desist 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.



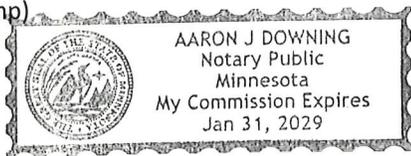
Paul Dotson

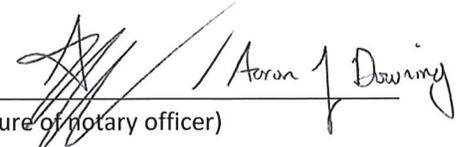
STATE OF Minnesota

COUNTY OF Roseau

This instrument was acknowledged before me on 12/4/25 by Paul Dotson.

(stamp)





(Signature of notary officer)

My commission expires: 01/31/2029

