STATE OF MINNESOTA
BOARD OF ACCOUNTANCY

In the Matter of the CPA Certificate of

Molly Elisabeth Giles
CPA Certificate No. 31817

STIPULATION AND CONSENT ORDER

Board File No.2025-091

STIPULATION

Molly Giles ("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 is REPRIMANDED pursuant to Minn. Stat. § 326A.08 (2024).

B. Respondent shall pay to the Board a CIVIL PENALTY of $500. 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.

C. Respondent shall comply with all statutes and rules within the Board's jurisdiction. *See* Minn. Stat. ch. 326A (2024) and Minn. R. ch. 1105 (2025).

D. 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 January 22, 2020.

2. The Board selected Respondent for audit of their continuing education ("CPE") records for the three-year period ending June 30, 2024.

3. For the CPE reporting year 2022, Respondent was only able to verify 23 of the previously reported 42.5 hours. There was a discrepancy between what had been previously reported with the Respondent's 2023 renewal and what was reported with the CPE audit documentation. Respondent reported 42.5 hours with the renewal but reported only 39 hours with the audit documentation.

   a. Eight of the courses, totaling 16 hours, reported with the audit documentation initially lacked sufficient documentation during the audit process. Respondent subsequently obtained additional supporting documentation and certificates relating to certain previously disputed courses following efforts to reconcile transcript and certificate inconsistencies associated with the AICPA learning platform transition.

   b. This was Respondent's second reporting year reporting CPE, so Respondent was still in compliance with the CPE requirements.

4. For the CPE reporting year 2023, Respondent was only able to verify 47.5 of the previously reported 55 hours. As a result, Respondent was short 9.3 of the required 72 hours from an approved sponsor for the three years ended June 30, 2023.

5. For the CPE reporting year 2024, Respondent was only able to verify 43.7 of the previously reported 44.7 hours. As a result, Respondent was short 10.8 of the required 72 hours from an approved sponsor for the three years ended June 30, 2024.

6. Respondent carried back 21 hours to CPE reporting year 2023 and paid the CPE noncompliance fee.

7. Respondent submitted incorrect information for their CPE for the 2022, 2023 and 2024 CPE reporting years 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) and (E), 1105.3100, subp. 4(E), 1105.3200(A), (B) and (C), 1105.5600, subp. 1(C)(5), and 1105.7800(A) and (B) (2025).

3. Respondent is subject to discipline pursuant to Minn. Stat. § 326A.08, subd. 5(a)(1) 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 or Respondent 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 are represented by counsel.

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.

Molly Giles

Molly Elisabeth Giles, CPA

COMPLAINT COMMITTEE

LANCE RADZIEJ, CPA
Chair

Dated: August 4, 2026

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: 08/13/, 2026

GODSON SOWAH, CPA
Board Vice Chair

STATE OF MINNESOTA
MINNESOTA BOARD OF ACCOUNTANCY
85 East 7th Place, Suite 125
St. Paul, MN 55101

CERTIFICATE OF SERVICE BY U.S. MAIL

Case Title: **Molly Elisabeth Giles**
File #2025-091

I, Holly Salmela, verify by oath or affirmation that on the 17th day of August, 2026, at the City of Saint Paul, in the county of Ramsey, in the State of Minnesota, served the Stipulation and Consent Order by depositing a true and correct copy in the United States mail, properly enveloped, with first class postage prepaid and addressed to the following named individual(s) or entities at the address indicated below.

Fabian Hoffner
The Hoffner Firm, Ltd.
1600 Utica Ave S 9th Fl
St. Louis Park, MN 55416

Holly Salmela