

BEFORE THE MINNESOTA  
BOARD OF EXECUTIVES FOR LONG-TERM SERVICES AND SUPPORTS

In the Matter of  
Jackie Brula, LALD  
License No. 2795

**STIPULATION AND  
CONSENT ORDER**

IT IS HEREBY STIPULATED AND AGREED by Jackie Brula, LALD (“Licensee”), and the Minnesota Board of Executives for Long-Term Services and Supports Standards of Practice Committee (“Committee”) as follows:

**I.**

**JURISDICTION**

1. The Minnesota Board of Executives for Long-Term Services and Supports (“Board”) is authorized pursuant to Minnesota Statutes chapter 144A to license and regulate assisted living directors and to take disciplinary action as appropriate.

2. Licensee holds a license from the Board to practice as a licensed assisted living director in the State of Minnesota and is subject to the jurisdiction of the Board with respect to the matters referred to in this Stipulation and Consent Order.

**II.**

**REPRESENTATION**

3. Licensee is self-represented in this matter. The Committee is represented by Alex Mountain, Assistant Attorney General.

**III.**

**FACTS**

For the purpose of this Stipulation and Consent Order only, the Board finds the following:

4. On August 4, 2021, the Board granted Licensee an Assisted Living Director (“ALD”) license.

5. Licensee worked for an assisted living facility, located in Farmington.

6. On August 27, 2024, during a Minnesota Department of Health (“MDH”) survey of the facility, Licensee provided to the surveyors a document she altered with a forged provider signature. Licensee recognizes that this was unprofessional behavior.

#### IV.

#### REGULATIONS

7. Licensee acknowledges the conduct described in section III. above constitutes a violation of Minnesota Rules 6400.7095, subpart 1.G. (committed acts of misconduct), 1.H. (fraudulent, dishonest, or deceptive conduct), and 1.I. (unprofessional conduct), and justifies the disciplinary action described in section V. below.

#### V.

#### DISCIPLINARY ACTION

8. Upon this Stipulation and all of the files, records, and proceedings herein, and without any further notice or hearing herein, Licensee consents that until further order of the Board, the Board may make and enter an order as follows:

##### A. Conditions

9. The Board **CONDITIONS** Licensee’s license to practice as a licensed assisted living director in the State of Minnesota as follows:

a. ***Completion of Coursework.*** Licensee shall arrange to enroll in, and complete, no less than four (4) hours of education on the topic(s) of ethics and professional accountability. All fees for the course shall be paid by Licensee. Licensee must obtain preapproval from the Committee for the course(s) that Licensee selects. To secure preapproval, Licensee shall

submit to the Committee a course description, including course objectives and the instructor's name and applicable credentials. Licensee shall complete the course within sixty (60) days of the date of the Order. Successful completion of the course shall be determined at the sole discretion of the Committee and verified by Licensee's submission of an official certificate indicating completion of the preapproved course. Licensee shall be responsible for any expenses associated with this coursework.

#### B. Civil Penalty

10. Licensee shall pay to the Board a **CIVIL PENALTY** of \$250 within six months of the date this Stipulation and Consent Order is adopted by the Board. Licensee shall mail her payment to the Board of Executives for Long-Term Services and Supports, c/o Stephen Jobe, Executive Director, 335 Randolph Avenue, Suite 210-B, St. Paul, MN 55102.

#### C. Removal of Conditions

11. Upon completing the requirements set forth in paragraphs 9 and 10, Licensee may petition to have the conditions removed from Licensee's license. Licensee may be required to meet with the Committee upon petitioning. Licensee shall have the burden of proving that Licensee has complied with the conditions and that Licensee is qualified to safely and competently practice as an assisted living director in the State of Minnesota. Licensee's compliance with the foregoing requirements shall not create a presumption that the conditions should be removed. Upon consideration of the evidence submitted by Licensee, the Committee may remove, amend, or continue the conditions and limitations imposed by this Stipulation and Consent Order.

## **VI.**

### **CONSEQUENCES FOR NONCOMPLIANCE OR ADDITIONAL VIOLATIONS**

12. It is Licensee's responsibility to ensure all documents, reports, or other materials required to be filed with the Board pursuant to this Stipulation and Consent Order are timely filed by those preparing the report, evaluation, or documentation. Failure to file reports on or before their due date is a violation of this Stipulation and Consent Order. The information contained in the reports, evaluations, and documentation shall be submitted to the Board by United States Mail, courier, electronic mail addressed to the Executive Director, or personal delivery only. The Board's mailing address is 335 Randolph Avenue, Suite 210-B, St. Paul, Minnesota 55102.

13. If Licensee fails to comply with or violates this Stipulation and Consent Order, the Committee may, in its discretion, seek additional discipline either by initiating a contested case proceeding pursuant to Minnesota Statutes chapter 14 or by bringing the matter directly to the Board pursuant to the following procedure:

a. The Committee shall schedule a hearing before the Board. At least 20 days before the hearing, the Committee shall mail Licensee a notice of the violation(s) alleged by the Committee. In addition, the notice shall designate the time and place of the hearing. Within ten days after the notice is mailed, Licensee shall submit a written response to the allegations. If Licensee does not submit a timely response to the Board, the allegations may be deemed admitted.

b. The Committee, in its discretion, may schedule a conference with Licensee prior to the hearing before the Board to discuss the allegations and to attempt to resolve the allegations through agreement.

c. Prior to the hearing before the Board, the Committee and Licensee may submit affidavits and written argument in support of their positions. At the hearing, the Committee and Licensee may present oral argument. Argument shall not refer to matters outside the record.

The evidentiary record shall be limited to the affidavits submitted prior to the hearing and this Stipulation and Consent Order. The Committee shall have the burden of proving by a preponderance of the evidence that a violation has occurred. If Licensee has failed to submit a timely response to the allegations, Licensee may not contest the allegations, but may present argument concerning the appropriateness of additional discipline. Licensee waives a hearing before an administrative law judge, discovery, cross-examination of adverse witnesses, and other procedures governing hearings pursuant to Minnesota Statutes chapter 14.

d. Licensee's correction of a violation before the conference, hearing, or meeting of the Board may be taken into account by the Board but shall not limit the Board's authority to impose discipline for the violation. A decision by the Committee not to seek discipline when it first learns of a violation shall not waive the Committee's right to later seek discipline for that violation, either alone or in combination with other violations, at any time while this Stipulation and Consent Order is in effect.

e. Following the hearing, the Board will deliberate confidentially. If the allegations are not proved, the Board shall dismiss the allegations. If a violation is proved, the Board may impose additional discipline, including additional conditions or limitations on Licensee's practice, suspension, or revocation of Licensee's license.

f. Nothing herein shall limit the Committee's or the Board's right to temporarily suspend Licensee's license pursuant to Minnesota Statutes section 214.077 or 214.104, based on a violation of this Stipulation and Consent Order or based on conduct of Licensee not specifically referred to herein.

## **VII.**

### **ADDITIONAL INFORMATION**

14. Licensee is responsible for all costs incurred as a result of compliance with this Stipulation and Consent Order.

15. In the event Licensee resides or practices outside the State of Minnesota, Licensee must promptly notify the Board in writing of the location of his residence and all work sites. Periods of residency or practice outside of Minnesota will not be credited toward any period of Licensee's suspended, limited, or conditioned license in Minnesota unless Licensee demonstrates that practice in another state conforms completely with Licensee's Minnesota license to practice as a licensed assisted living director.

16. In the event the Board in its discretion does not approve this settlement, this Stipulation is withdrawn and shall be of no evidentiary value and shall not be relied upon nor introduced in any disciplinary action by either party hereto except that Licensee agrees that should the Board reject this Stipulation, and if this case proceeds to hearing, Licensee will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation or of any records relating hereto.

17. Either party may seek enforcement of this Stipulation and Consent Order in any appropriate civil court.

18. Licensee waives all formal hearings on this matter and all other procedures before the Board to which Licensee may be entitled under the Minnesota or United States constitutions, statutes, or rules and agrees that the order to be entered pursuant to the stipulation shall be the final order herein.

19. Licensee hereby knowingly and voluntarily waives any and all claims against the Board, the Office of the Minnesota Attorney General, the State of Minnesota and their agents,

employees, and representatives which may otherwise be available to Licensee relative to the action taken or authorized against Licensee's license to practice as a licensed assisted living director under this stipulation.

20. Licensee hereby acknowledges that she has read, understands, and agrees to this stipulation and has freely and voluntarily signed the stipulation without threat or promise by the Board or any of its members, employees, or agents.

21. This Stipulation and Consent Order contains the entire agreement between the parties there being no other agreement of any kind, verbal or otherwise, which varies this stipulation.

## VIII.

### DATA PRACTICES NOTICES

22. This Stipulation and Consent Order constitutes disciplinary action by the Board and is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5. This Stipulation and Consent Order is a public document and will be sent to all appropriate data banks and entities consistent with Board policy.


#### CONSENT:

LICENSEE

  
\_\_\_\_\_  
JACKIE BRULA, LALD

Dated: 4/05/25

FOR THE STANDARDS OF  
PRACTICE COMMITTEE

  
\_\_\_\_\_  
BOARD MEMBER

Dated: 4/9/2025

## ORDER

Upon consideration of the Stipulation and all the files, records, and proceedings herein, the terms of the Stipulation are approved and adopted, and the recommended remedy set forth in the Stipulation is hereby issued as an Order of this Board effective this 23 day of April, 2025.

MINNESOTA BOARD  
OF EXECUTIVES FOR LONG-TERM  
SERVICES AND SUPPORTS

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STEPHEN JOBE  
Executive Director

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