

STATE OF MINNESOTA  
DEPARTMENT OF COMMERCE

APR 28 2025  
Rec'd \$ 2085

In the Matter of the Real Property Appraiser License of Cynthia Ann Reverts  
License No. 40335033

CONSENT ORDER

TO: Cynthia Ann Reverts  
1013 150<sup>th</sup> Avenue  
Luverne, MN 56156

Commissioner of Commerce Grace Arnold (Commissioner) has determined as follows:

1. The Commissioner has advised Cynthia Ann Reverts (Respondent) that she is prepared to commence formal action pursuant to Minn. Stat. § 45.027 (2022), and other applicable law, based on the following allegations pertaining to an appraisal report completed for a property in Hendricks, Minnesota:

- a. Respondent failed to accurately report the location of the comparable properties utilized in the report. Comparable 1 was not reported as having golf course location. Comparable 2 was reported with a Minnesota address, but is located in South Dakota. Comparable 3 was not reported as having lake frontage. Inaccurately stating the characteristics of the comparable properties is a violation of the Uniform Standards of Appraisal Practice (USPAP) Standards Rule (SR) 1-1 (c) (2020), Minn. Stat. §§ 82B.195 subd. 1, subd. 3 (1)(i), and 82B.20 subd. 2 (5)(6)(13) (2024).
- b. Respondent failed to make adjustments that were indicated by the market. Comparable 2 and Comparable 3 are both located with water frontage. Neither received an adjustment. The report lack reasoning for why this adjustment was not made. Comparable 1 received a -\$20,000 for a beneficial location. The report failed to identify what made the location beneficial. Failure to make adjustments that are

indicated by the market is a violation of USPAP SR 1-1 (a) (2020) and Minn. Stat. §§ 82B.195 subd. 1, subd. 3 (1)(viii), and 82B.20 subd. 2 (5)(6)(13) (2024).

- c. Respondent stated the Highest and Best Use of the subject property, but failed to include a summary of that opinion. Failure to include this in an appraisal report is a violation of USPAP SR 1-3 (b), SR 2-2 (a)(xii) (2020), and Minn. Stat. §§ 82B.195 subd. 1, and 82B.20 subd. 2 (5)(6)(13) (2024).
- d. Respondent failed to include sufficient information to allow the intended user(s) to understand the report. Respondent failed to include a summary or information related to the subject being located in Minnesota and each of the three comparables being located in South Dakota. Failure to include explanation and details regarding salient features of the subject and comparable properties in the report is a violation of USPAP SR 1-4 (a), SR 2-1 (b), 2-2 (a)(x)(1), 2-2 (a)(x)(5) (2020), Minn. Stat. §§ 82B.195 subd. 1, and 82B.20 subd. 2 (5)(6)(13) (2024).
- e. Respondent failed to maintain a work file that supported the opinions and conclusions stated in the appraisal report. The work file presented to the Department did not contain information related to the cost approach, comparable properties, or analysis or summary of how adjustments used in the report were determined. Failure to maintain a work file that supports the opinions and conclusions in the report is a violation of the Record Keeping Rule of USPAP and Minn. Stat. § 82B.071 subd. 2 (2024).

2. Respondent acknowledges that they have been advised of the right to a hearing in this matter, to present argument to the Commissioner, and to appeal from any adverse determination after a hearing. Respondent hereby expressly waives those rights. Respondent further acknowledges that they have been represented by legal counsel throughout these proceedings or has waived that right.

3. Respondent has agreed to informal disposition of this matter without a hearing as provided under Minn. Stat. § 14.59 (2022) and Minn. R. 1400.5900 (2023).

4. For purposes of Minn. Stat. § 16D.17 (2022), Respondent expressly waives the right to any notice or opportunity for a hearing on any civil penalty imposed by the Commissioner. Further, Minn. Stat. § 16D.17 (2022) allows the Commissioner to file and enforce the civil penalty imposed by this Order as a judgment against Respondent in district court without further notice or additional proceedings.

5. The civil penalty and/or any resulting judgment arising from this Order will be non-dischargeable in any bankruptcy proceeding. *See* 11 U.S.C. 523 (a)(7) (“A discharge under section 727, 1141, 1228(a), 1228(b) or 1328(b) of this title does not discharge an individual debtor from any debt... to the extent such debt is for a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, and is not compensation for actual pecuniary loss, other than a tax penalty...”).

6. The following Order is in the public interest.

**NOW, THEREFORE, IT IS HEREBY ORDERED**, pursuant to Minn. Stat. Ch. 45 (2022) that:

A. Respondent shall pay a civil penalty in the amount of \$3,000 to the State of Minnesota. The Commissioner has stayed \$1,500 of this penalty. Respondent must pay \$1,500 **at the time the Consent to Entry of Order is signed**. The stayed portion of the civil penalty may be lifted if Respondent commits further violations of any law, rule, or order related to the duties and responsibilities entrusted to the Commissioner. If the Commissioner determines that Respondent has committed further violations of any law, rule, or order over which the Commissioner has authority, the stay shall be lifted and the stayed portion of the penalty shall become effective in addition to any additional administrative action the Commissioner deems appropriate for the new violation(s). If the Commissioner seeks to lift the stay, Respondent may request a hearing to challenge the **factual basis for lifting the stay**, but may not challenge the amount of the stayed penalty. If the stay has not been lifted by May 1, 2028, the stayed portion of the civil penalty will be vacated;

B. Respondent shall complete the following corrective education courses provided by the Appraisal Foundation. The courses must be completed within 90 days of the effective date of this order:

- a. Appraiser Self Protection: Documentation and Record Keeping;
- b. Missing Explanations; and
- c. Residential Report Writing vs. Form Filling.

These courses cannot be used toward Respondent's continuing education credits. Course completion certificates must be supplied to the Department within 30 days of completing and passing course requirements;

C. Respondent shall cease and desist from violating any laws, rules, or orders related to the duties and responsibilities entrusted to the Commissioner under Minnesota Statute Chapters 82B and 45.027; and

D. Respondent shall pay all investigative costs in the amount of \$585 at the time the Consent to Entry of Order is signed pursuant to Minn. Stat. § 45.027, subd. 1(8) (2022).

This Order shall be effective upon signature by or on behalf of the Commissioner.

Date: May 2, 2025

GRACE ARNOLD  
Commissioner



JACQUELINE OLSON  
Assistant Commissioner of Enforcement  
Minnesota Department of Commerce  
85 Seventh Place East, Suite 280  
St. Paul, MN 55101  
(651) 539-1600

CONSENT TO ENTRY OF ORDER

The undersigned states that they have read this Consent Order; that the undersigned knows and fully understands its contents and effect; that the undersigned has been advised of the right to a hearing in this matter, to present argument to the Commissioner, and to appeal from any adverse determination after a hearing and expressly waives those rights. Respondent further acknowledges that Respondent has been represented by legal counsel throughout these proceedings, or has been advised of the right to be represented by legal counsel, which right Respondent hereby expressly waives; and that Respondent consents to entry of this Order by the Commissioner. It is further understood that this Consent Order constitutes the entire settlement agreement between the parties, there being no other promises or agreements, either express or implied.

Cynthia Ann Reverts

Date: 4/21/2025

By: Cynthia Ann Reverts  
Signature

STATE OF Minnesota  
COUNTY OF Rock

Signed or attested before me on 4-21-25 (Date).

(Notary stamp)



Keri L. Hansen  
(Signature of Notary)

My Commission expires:

1-31-28