

STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS  
FOR THE BOARD OF ARCHITECTURE, ENGINEERING, LAND SURVEYING,  
LANDSCAPE ARCHITECTURE, GEOSCIENCE AND INTERIOR DESIGN

In the Matter of the Professional Engineer License  
of Charles Marohn

**COMPLAINT COMMITTEE'S  
RESPONSE TO RESPONDENT'S  
DISCOVERY REQUESTS**

The Complaint Committee of the Minnesota Board of Architecture, Engineering, Land Surveying, Landscape Architecture, Geoscience and Interior Design provides the following response to Respondent Charles Marohn's Discovery Requests:

**GENERAL OBJECTIONS**

All answers and productions are made without waiving:

- a. Questions as to competency, relevance, materiality, privilege, scope, and admissibility of evidence for any purpose in any subsequent proceeding or the hearing of this or any other action.
- b. The right to object to the use of any of the answers or the subject matter thereof in any subsequent proceeding or the hearing of this or any other action on any grounds.
- c. The right to supplement and amend these answers as the Committee's investigation, discovery, and preparation for trial continues.

The Committee objects generally to each discovery request to the extent that it seeks discovery of:

- a. Information or documents protected by the Minnesota Government Data Practices Act, except as provided in the protective order issued by the ALJ in this matter;
- b. Information or documents subject to the attorney-client privilege, the public officer privilege of Minn. Stat. ch. 595, the inter-governmental memoranda or agency deliberative privileges developed at common law, or any other privilege;
- c. Information or documents constituting the work product of the Committee or its attorney;

d. Information generated or documents prepared in anticipation of litigation or for trial by or for the Committee or its representatives;

e. Information or documents not in the possession or control of the Committee or not generated or obtained by it in the regular course of business.

f. Information within the possession, custody, or control of any respondent, or of publicly available information, or such that the information is obtainable from some other source that is more convenient, less burdensome or less expensive, or the production of the information will impose undue burden, inconvenience, or expense upon the Committee.

The Committee objects to each request to the extent that it seeks to impose upon the Committee duties not imposed by the Minnesota Rules of Civil Procedure or the Administrative Procedure Act. The Committee's responses assume that words used in the requests have their ordinary and customary meanings without regard to any special meanings assigned to them by Respondent.

The Committee does not and will not waive any of its general or particular objections in the event it may furnish materials or information coming within the scope of any such objections.

**INTERROGATORY NO. 1.** Identify the person or persons who prepared or participated in the preparation of the answers to these Interrogatories and, as to each Interrogatory, state the name of each and every person who answered or supplied information for the answer to that particular Interrogatory; and with respect to each such person, specifying in all possible detail, each and every fact that they have knowledge of the identity of each and every document in which discusses, reflects, refers or relates to any such fact.

**RESPONSE:**

As to all interrogatories: Doreen Johnson, Executive Director, Minnesota Board of AELSLAGID, and Dillon Lang, Investigator, Minnesota Board of AELSLAGID. These individuals may be contacted through the Committee's attorney, and the Committee objects to providing their home addresses, phone numbers, and email addresses as calling for not-public data under MGDPA sections 13.37 and 13.43. The facts related to this case that these individuals have knowledge of are limited to the facts contained in the Committee's investigation file and the

Board's licensing file, and the Committee objects to the extent this interrogatory seeks disclosure of that file without a protective order as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020) and unduly burdensome as to the licensing file, which is produced in response to Marohn's requests for production.

**INTERROGATORY NO. 2.** Identify each and every person having knowledge with respect to any of the allegations contained in the Notice and Order for Prehearing Conference, your July 24, 2020 Letter to Respondent, David Dixon's Complaint and/or Respondent's Responses to the Allegations against him with respect to each such person identified, specify in all possible detail each and every fact of which each such identified person has knowledge.

**RESPONSE:**

The current five Committee members, Eric Friske, Tari Rayala, Denise Kazmierczak, Paul Vogel, and Keith Rapp, as well as two former Committee members, Scott Robinson and Wayne Hilbert, and current or former Board employees Doreen Johnson, Dillon Lang, Holly Salmela, Peng Her, Allison Desmond, and Leama Sather. These individuals may be contacted through the Committee's attorney, and the Committee objects to providing their home addresses, phone numbers, and email addresses as calling for not-public data under MGDPA sections 13.37 and 13.43. The facts related to this case that these individuals have knowledge of are limited to the facts contained in the Committee's investigation file and the Board's licensing file, and the Committee objects to the extent this interrogatory seeks disclosure of the investigative file without a protective order as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020), and unduly burdensome as to the licensing file, which is produced in response to Marohn's requests for production.

David Dixon  
514 Americas Way #1885  
Box Elder, SD 57719  
307-735-3478  
Email address unknown

The Committee's knowledge of Dixon's knowledge is limited to that reflected in his complaint, and the Committee objects as unduly burdensome to restating the content of that complaint here.

Charles Marohn  
616 N 4th Street  
Brainerd, MN 55401  
218-330-6694  
marohn@communitygrowth.com

The Committee objects as unduly burdensome to providing Marohn with a description of Marohn's own knowledge.

**INTERROGATORY NO. 3.** Identify each and every document which you reviewed and/or relied upon in preparing responses to these discovery requests and include in your answer the date of each document, its author and any designated recipient of the document.

**RESPONSE:**

Every Board order issued from 2018 to the present. These orders are produced in response to request for production 1. Each order was adopted by the Board, states its recipient on the first page, and states its date on the last page. The Committee objects as unduly burdensome to restating this information here.

Agendas and minutes for the Committee's meetings. These documents were prepared by Doreen Johnson, Dillon Lang, and Peng Her for the Committee members for the Committee on or about the dates of the Committee's scheduled meetings.

The Committee's investigation file for this case. The Committee objects to disclosing the contents of this file as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020).

Marohn's licensing file, a copy of which is produced in response to Marohn's requests for production. That copy reflects, to the extent known to the Committee, the dates, authorship, and

recipients of its contents, and the Committee objects as unduly burdensome to restating that information here.

**INTERROGATORY NO. 4.** If any of the information, documents and/or other items requested in the Respondent's First Set of Interrogatories or First Request for Production of Documents is withheld on the basis of privilege, work product or otherwise, identify each item of information so withheld and provide the following information:

- (a) the basis for the claim of privilege, work product, or other ground of non-disclosure; and
- (b) if the information is contained in a document, provide the identify of the document, the number of pages, attachments, and/or appendices, the identify of each and every person who had access to work custody of the document, the present custodian of the document, and describe the subject matter of the document.

**RESPONSE:**

The Committee's investigation file is withheld on the basis of Minn. Stat. § 13.39, subd. 2, and 13.41, subd. 4 (2020), as seeking confidential data without a Minn. Stat. § 13.03, subd. 6 (2020), protective order. The Committee objects as unduly burdensome to identifying the authorship and access of each constituent document because such questions are immaterial to whether the file is confidential active civil investigative data. The file is currently in the custody of the Board's staff.

Not-public data regarding cases other than this one was withheld on the basis of Minn. Stat. § 13.39, subd. 2, and 13.41, subd. 4 (2020) ), as seeking confidential data without a Minn. Stat. § 13.03, subd. 6 (2020), protective order. The Committee objects as unduly burdensome to identifying the authorship and access of each constituent document because such questions are immaterial to whether the file is confidential active civil investigative data. These files are currently in the custody of the Board's staff.

The Committee's agendas, minutes, and recordings were withheld on the basis of Minn. Stat. § 13.39, subd. 2, and 13.41, subd. 4 (2020). Portions of the recordings are also withheld to

the extent Committee members sought or received legal advice from the Committee's attorney. These documents were created by Board staff and are accessible only to the Committee and Board staff. They are currently in the custody of the Board's staff.

**INTERROGATORY NO. 5.** Identify each person you expect to call as an expert witness at the hearing of the above-captioned action and, with respect to each such expert witness, state the subject matter on which the expert is expected to testify, the assessment of the facts and opinions of which the expert is expected to testify, a summary of the grounds for each opinion, and the identity of all documents or other items the expert reviewed or relied upon in forming such opinions.

**RESPONSE:**

The Committee does not expect to call any person as an expert witness.

**INTERROGATORY NO. 6.** With respect to each Request for Admission which you did not unequivocally admit, specify in all possible detail the reasons for not unequivocally admitting the Request including, but not limited to, each and every fact which you claim makes the Request for Admission untrue.

**RESPONSE:**

As to request for admission 3, the Board sent notification of the complaint to Marohn at his address on file with the Board (11315 Leewood Lane, East Gull Lake, MN 56401) on March 5 and April 29, 2020, before Marohn renewed his license.

As to request for admission 4, the Board renewed Marohn's license, not the Committee. The Committee does not review or process license renewals, and Board staff response for license renewals was unaware of the Complaint against Marohn when they processed Marohn's renewal.

**INTERROGATORY NO. 7.** Identify each and every document in your possession, custody and/or control that relates, refers, and/or pertains in any way to Respondent.

**RESPONSE:**

The Committee objects to this interrogatory as overly broad. Notwithstanding that objection:

The Committee's investigation file regarding this case, as well as its investigation file of the 2015 complaint against Marohn.

The Board's licensing file regarding Marohn.

The Committee's agendas and minutes for its 7/21/2020, 9/15/2020, 11/20/2020, 2/9/2021, 3/10/2021, 4/15/2021, 5/19/2021, 6/23/2021, and 8/18/2021 meetings. Recordings of the Committee's meetings on 7/21/2020, 9/15/2020, 11/20/2020, 2/9/2021, 3/10/2021, and 4/15/2021.

All pleadings in *Marohn v. Minn. Bd. of Arch., Engineering, Land Surveying, Landscape Architecture, Geoscience, and Interior Design*, No. 21-CV-01241 (D. Minn.)

The Board's agenda and minutes for its 7/20/2021 meeting.

**INTERROGATORY NO. 8.** State in detail the substance of each and every conversation you have had that pertains, refers, and/or relates in any way to Respondent.

**RESPONSE:**

On 6/18/2021, Dillon Lang contacted the complainant to obtain an updated complaint release. During that conversation, the complainant stated that he was not a professional engineer and that, although the complainant had no issues with what Marohn was saying, the complainant felt it was unfair that Marohn could call himself a professional engineer when Marohn was not a professional engineer when the complainant could not do so.

Beyond this conversation, the Committee and its staff have no memory of any conversations regarding Marohn beyond what is reflected in the Committee's investigation file or the recordings of its meetings. The Committee objects to the extent this interrogatory seeks disclosure of the investigative file or those recordings without a protective order as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). The Committee further objects under the attorney-client privilege to the extent it seeks conversations with the Committee's attorney.

**INTERROGATORY NO. 9.** Identify each and every document in your possession, custody and/or control that relates, refers, and/or pertains in any way to the allegations contained in this action, including but not limited to, the allegations contained in the Notice and Order for Prehearing Conference, and the Complaint of David Dixon.

**RESPONSE:**

The Committee's investigation file regarding this case. The Board's licensing file regarding Marohn.

**INTERROGATORY NO. 10.** Identify each and every professional engineer since January 1, 2018 that you have disciplined for holding himself out as a licensed professional engineer, and for each such disciplinary proceeding, identify the discipline sought, the ultimate outcome of the proceeding, and whether each respondent in said proceeding had been practicing as an engineer during the time period he or she allegedly held themselves out as a licensed professional engineer.

**RESPONSE:**

The Committee objects to this interrogatory as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020), to the extent it seeks information not contained in the Board's public orders or public records of contested-case proceedings at OAH. All such public information is produced in response to request for production 4, and the Committee objects as unduly burdensome to restating the documents' contents here.

**INTERROGATORY NO. 11.** Identify each and every statement that you allege constitutes an admission against interest by Respondent.

**RESPONSE:**

All such admissions that the Committee is aware of were obtained as part of the Committee's investigation into this case and are part of the Committee's investigation file, and the Committee consequently objects to this interrogatory as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020).

**INTERROGATORY NO. 12.** Identify each and every statement, oral or written, in which you allege that Respondent held himself out as a professional engineer.

**RESPONSE:**

In *Strong Towns: A Bottom-Up Revolution to Rebuild American Prosperity*, Marohn claimed to be a professional engineer.

On multiple pages at <https://www.strongtowns.org>, Marohn claimed to be a professional engineer. The Committee has not reviewed every page of the site, but Marohn claimed to be a professional engineer at least in Marohn's biography on the Staff page (<https://www.strongtowns.org/staff>) and in Marohn's instructor biography of courses offered for sale (e.g. <https://academy.strongtowns.org/p/urban-design-principles-for-a-strong-town>).

On his LinkedIn profile (<https://www.linkedin.com/in/charlesmarohn>), Marohn claimed to be a professional engineer.

At a keynote speech at the 2019 Power of Ten event, Marohn claimed to be a professional engineer.

At the Wayne Hyatt Lecture Series on January 16, 2020, Marohn claimed to be a professional engineer.

**INTERROGATORY NO. 13.** Identify any evidence you allege demonstrates that Respondent intentionally held himself out as a licensed professional engineer with knowledge that his license had lapsed.

**RESPONSE:**

The Committee is not presently aware of evidence that Marohn had knowledge that his license was expired when he falsely held out as professional engineer.

**INTERROGATORY NO. 14.** Identify each and every occasion on which you allege that Respondent practiced, or offered to practice as a professional engineer during the time period his licensure was lapsed.

**RESPONSE:**

Under the definition contained in Minn. Stat. § 326.02, subd. 3, a person practices engineering by holding out as being able to perform. any technical professional service, such as planning, design or observation of construction for the purpose of assuring compliance with specifications and design, in connection with any public or private structures, buildings, utilities, machines, equipment, processes, works, or projects wherein the public welfare or the safeguarding of life, health, or property is concerned or involved, when such professional service requires the application of the principles of mathematics and the physical and applied engineering sciences, acquired by education or training, and by experience. Marohn so held out by falsely claiming to be a PE as identified in the response to interrogatory 12.

**THERE IS NO INTERREROGATORY NO. 15.**

**INTERROGATORY NO. 16.** Identify each and every service you allege Respondent performed as professional engineer during the time period that his licensure was lapsed that constituted professional engineering under the definition contained in Minn. Stat. § 326.02, subd. 3.

**RESPONSE:**

Under the definition contained in Minn. Stat. § 326.02, subd. 3, a person practices engineering by holding out as being able to perform. any technical professional service, such as planning, design or observation of construction for the purpose of assuring compliance with specifications and design, in connection with any public or private structures, buildings, utilities, machines, equipment, processes, works, or projects wherein the public welfare or the safeguarding of life, health, or property is concerned or involved, when such professional service requires the application of the principles of mathematics and the physical and applied engineering sciences, acquired by education or training, and by experience. Marohn so held out by falsely claiming to be a PE as identified in the response to interrogatory 12.

**INTERROGATORY NO. 17.** Identify each and every false statement you allege Respondent made on an application for renewal as stated in Count II of the Notice of Hearing.

**RESPONSE:**

Marohn stated on his 2018 and 2020 renewal applications that he had not represented himself as a professional engineer without proper licensure, either verbally or on any printed matter, in the State of Minnesota. That was a false statement because he had represented himself as a PE as identified in response to interrogatory 12.

**INTERROGATORY NO. 18.** Identify each and every misrepresentation you allege Respondent has made as stated in County II of the Notice of Hearing.

**RESPONSE:**

Marohn stated on his 2018 and 2020 renewal applications that he had not represented himself as a professional engineer without proper licensure, either verbally or on any printed matter, in the State of Minnesota. This was a misrepresentation because he had represented himself as a PE as identified in response to interrogatory 12.

**INTERROGATORY NO. 19.** Identify each and every fact supporting your allegation in Count II of the Notice of Hearing that Respondent has failed “to be truthful in all professional documents.”

**RESPONSE:**

Marohn stated on his 2018 and 2020 renewal applications that he had not represented himself as a professional engineer without proper licensure, either verbally or on any printed matter, in the State of Minnesota. That was not truthful because he had represented himself as a PE as identified in response to interrogatory 12.

**INTERROGATORY NO. 20.** Describe in detail the process by which you identify and select parties for professional discipline and whether those procedures were followed with respect to Respondent.

**RESPONSE:**

The Committee determines who to discipline through its complaint process. That process is described in detail at <https://www.mn.gov/aelslagid/docs/complaintprocess.pdf>. This process was followed with respect to Marohn.

**RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1** Produce each and every document identified in response to Respondent's First Set of Interrogatories.

**RESPONSE:**

Interrogatories 1 & 2: The Committee is unaware of any responsive documents.

Interrogatory 3: Documents AELS0024–75 are all public orders from complaint files from 2018 to the present. The Committee objects to producing the underlying complaint files as calling for confidential data or private data on individuals under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subds. 2 & 4 (2020). The Committee objects to producing its agendas and minutes as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). The Committee objects to producing its investigation file as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). Documents AELS0001–23 are Marohn's licensing file. The Committee objects to producing the portions of Marohn's licensing file contained in the licensing database in native format on the basis that such production would (1) require production of the entire database, which includes not public data on individuals, and (2) require production of the database's structure, which is nonpublic data under Minn. Stat. § 13.37, subd. 2(a) (2020).

Interrogatories 4 & 5: The Committee is unaware of any responsive documents.

Interrogatory 6: Documents AELS0076–77 are copies of allegation letters sent to Marohn's East Gull Lake address.

Interrogatory 7: The Committee objects to producing its investigation file as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). Documents AELS0078–89 are the Committee’s investigation file of the 2015 complaint against Marohn. Documents AELS0090–95 and AELS0098–0114 are the Board’s licensing file regarding Marohn. The Committee objects to producing its agendas, minutes, and recordings as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). Documents AELS0096–97 are the Board’s agenda and minutes for its 7/20/2021 meeting.

Interrogatory 8: The Committee is unaware of any responsive documents.

Interrogatory 9: The Committee objects to producing its investigation file as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). Documents AELS0115–0137 are the Board’s licensing file regarding Marohn.

Interrogatory 10: See documents produced in response to request for production 4. The Committee objects to this request for production as calling for confidential data or private data on individuals under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subds. 2 & 4 (2020), to the extent it seeks information not contained in the Board’s public orders or public records of contested-case proceedings at OAH.

Interrogatory 11: To the extent the Committee has documents responsive to this request, they are contained in its investigation file, and the Committee objects to producing documents contained in its investigation file as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020).

Interrogatory 12: To the extent the Committee has documents responsive to this request, they are contained in its investigation file, and the Committee objects to producing documents

contained in its investigation file as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020).

Interrogatory 13: The Committee is unaware of any responsive documents.

Interrogatories 14 & 16: See response regarding documents referenced in response to interrogatory 12.

Interrogatories 17–19: Documents AELS0138–39 are the license renewal applications in question. As to the evidence that Marohn’s representation was untruthful, see response regarding documents referenced in response to interrogatory 12.

Interrogatory 20: Document AELS0140 is a copy of the description of the complaint process.

**REQUEST NO. 2** Produce each and every document that discusses, reflects, relates, refers, and/or pertains in any way to the Respondent, including but not limited to all correspondence, electronic or otherwise.

**RESPONSE:**

Documents AELS0153–58 and AELS0161–77 are Marohn’s licensing file. Documents AELS141–52 are the closed investigation file regarding the 2015 complaint against Marohn. Documents AELS0159–60 are the full Board’s July agenda and minutes. The Committee objects to producing its agendas, minutes, and records, as well as its active investigation file relating to this case as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). The Committee further objects to the extent this request seeks correspondence with the Committee’s attorney or the portions of the Committee’s meetings where it sought or received legal advice under the attorney-client privilege.

**REQUEST NO. 3** Produce each and every document that discusses, reflects relates, refers, and/or pertains in any way to the allegations contained in the Notice of Hearing, your correspondence to Respondent, or David Dixon’s Complaint, as well as Respondent’s defenses.

**RESPONSE:**

Objection: calls for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020). The Committee further objects to the extent this request seeks correspondence with the Committee's attorney or the portions of the Committee's meetings where it sought or received legal advice under the attorney-client privilege.

**REQUEST NO. 4** Produce each and every document that discusses, reflects relates, refers, and/or pertains in any way to any disciplinary matters since January 1, 2018 under Minn. Stat. 326.02, subds. 1 and/or 3.

**RESPONSE:**

Documents AELS0178–81 and AELS0187–205 are the responsive Board's public orders. Documents AELS0182–0186 are the public OAH filings in cases where there was a public hearing. The Committee objects to the production of the Board's files in cases where there was no public hearing or documents not filed with OAH as calling for private data on individuals under Minn. Stat. § 13.41, subd. 2 (2020).

**REQUEST NO. 5** Produce each and every document that discusses, reflects, relates, refers, and/or pertains to in any way to any disciplinary since January 1, 2018 under inn. R. 1805.0200, subp. 1(B).

**RESPONSE:**

Documents AELS0206–10 are the responsive Board's public orders. The Committee objects to the production of the Board's files in cases where there was no public hearing or documents not filed with OAH as calling for private data on individuals under Minn. Stat. § 13.41, subd. 2 (2020).

**REQUEST NO. 6** Produce each and every document that discusses, reflects, relates, refers, and/or pertains to in any way to any disciplinary since January 1, 2018 under Minn. R. 1805.0200, subp. 2.

**RESPONSE:**

Documents AELS0211–16 are the responsive Board’s public orders. The Committee objects to the production of the Board’s files in cases where there was no public hearing or documents not filed with OAH as calling for private data on individuals under Minn. Stat. § 13.41, subd. 2 (2020).

**REQUEST NO. 7** Produce each and every document that discusses, reflects, relates, refers, and/or pertains to in any way to any disciplinary since January 1, 2018 under Minn. R. 1805.0200, subp. 4(C).

**RESPONSE:**

Documents AELS0217–18 and AELS0222–36 and AELS are the responsive Board’s public orders. Documents AELS0219–21 are the public OAH filings in cases where there was a public hearing. The Committee objects to the production of the Board’s files in cases where there was no public hearing or documents not filed with OAH, as calling for private data on individuals under Minn. Stat. § 13.41, subd. 2 (2020).

**REQUEST NO. 8** Produce each and every document that discusses, reflects, relates, refers, and/or pertains to in any way to any meetings you have had regarding Respondent and any disciplinary proceeding against him, including, but not limited to, meeting minutes.

**RESPONSE:**

Document AELS0239 is a page from the Committee’s 2015 investigation file noting that file was closed by the Committee due to no violation. Documents AELSXXXX are the Committee’s agenda and minutes of the meeting where the Committee considered that complaint. The Committee objects to producing the 2015 agenda and minutes in native (Microsoft Word) format on the basis that private data on individuals other than Marohn cannot be redacted. The Committee objects to producing its agendas, minutes, and records regarding the current complaint as calling for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020).

**REQUEST NO. 9** Produce each and every correspondence you have had with David Dixon.

**RESPONSE:**

Objection: calls for confidential data under Minn. Stat. §§ 13.39, subd. 2, and 13.41, subd. 4 (2020).

### **RESPONSE TO REQUEST FOR ADMISSIONS**

**REQUEST NO. 1** Admit that you have no evidence that Respondent performed any work as a professional engineer during the period his licensure was lapsed.

**RESPONSE:**

Admit.

**REQUEST NO. 2** Admit that you have no evidence that Respondent had knowledge that his licensure had lapsed until he renewed it.

**RESPONSE:**

Admit.

**REQUEST NO. 3** Admit that Respondent renewed his license before the Board sent any notification of a Complaint against him.

**RESPONSE:**

Deny.

**REQUEST NO. 4** Admit that you renewed Respondent's license despite having knowledge of the Complaint against him.

**RESPONSE:**

Deny.

Dated: October 27, 2021

**AS TO ANSWERS:**

I declare under penalty of perjury that everything  
I have stated in this document is true and correct:

DOREEN JOHNSON



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Executive Director

Minnesota Board of Architecture, Engineering,  
Land Surveying, Landscape Architecture,  
Geoscience and Interior Design

Dated: October 27, 2021

**AS TO OBJECTIONS:**

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/Allen Cook Barr

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ALLEN COOK BARR  
Assistant Attorney General  
Atty. Reg. No. 0399094

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St. Paul, Minnesota 55101-2134  
(651) 757-1487 (Voice)  
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ATTORNEY FOR COMPLAINT COMMITTEE  
OF MINNESOTA BOARD OF  
ARCHITECTURE, ENGINEERING, LAND  
SURVEYING, LANDSCAPE  
ARCHITECTURE, GEOSCIENCE AND  
INTERIOR DESIGN

**AFFIDAVIT OF SERVICE BY FIRST CLASS MAIL**

**Re:   *In the Matter of the Professional Engineer License of Charles Marohn***  
**OAH File No. 60-1006-37594**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF RAMSEY     )

BRENDA HANSON, being first duly sworn, deposes and says:

That at the City of St. Paul, County of Ramsey and State of Minnesota, on October 27, 2021, she caused to be served the Complaint Committee of the Minnesota Board of Architecture, Engineering, Land Surveying, Landscape Architecture, Geoscience and Interior Design's Response to Respondent's Discovery Requests along with a disc containing documents Bates numbered AELS0001-AELS0239, by depositing in the first-class mail at the City of St. Paul, State of Minnesota a true and correct copy thereof, properly enveloped with postage prepaid addressed to all persons at the addresses indicated below:

William F. Mohrman  
Mohrman, Kaardal & Erickson, PA.  
150 South Fifth Street, Suite 3100  
Minneapolis, MN 55402

*Attorney for Respondent*

/s/Brenda Hanson  
BRENDA HANSON

Subscribed and sworn to before me  
this 27th day of October, 2021.

/s/Elizabeth A. Soderstrom  
NOTARY PUBLIC  
My Commission expires January 31, 2025.

**EXHIBIT 1**

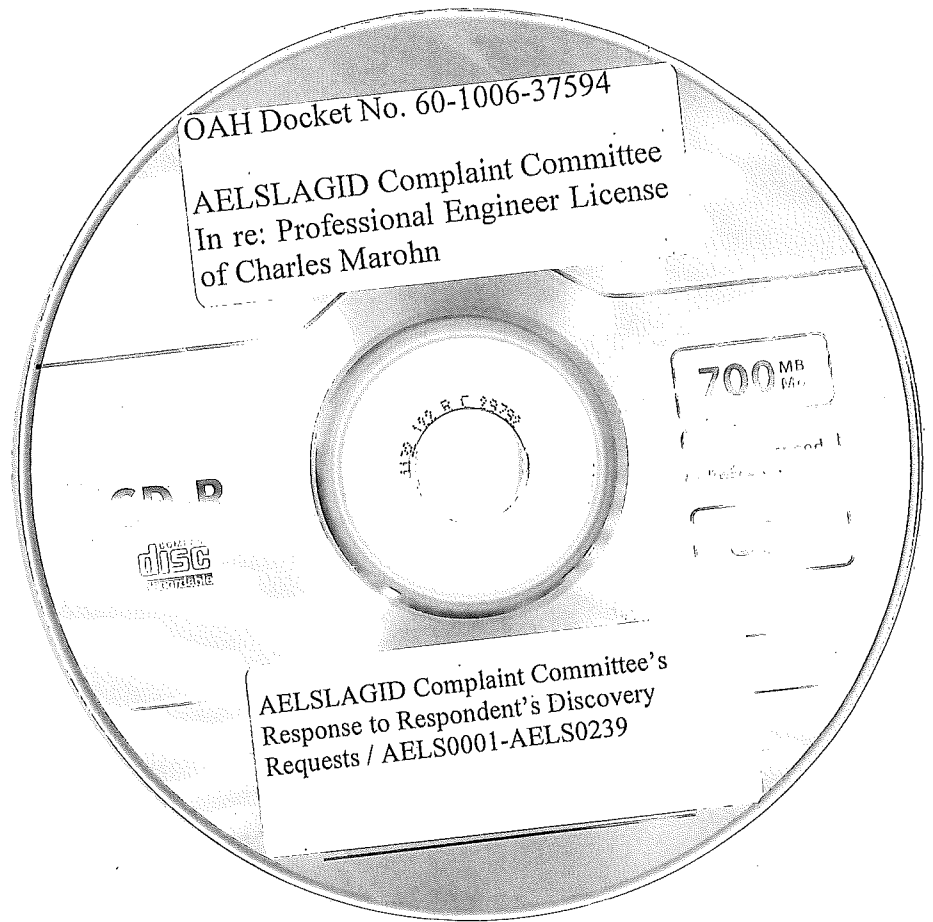


EXHIBIT 1