

*This opinion is nonprecedential except as provided by
Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A25-1469**

State of Minnesota,
Respondent,

vs.

Taylor Ann Brown-Snyder,
Appellant.

**Filed May 18, 2026
Affirmed
Smith, John, Judge ***

Ramsey County District Court
File No. 62SU-CR-23-2539

Keith Ellison, Attorney General, St. Paul, Minnesota; and

Katrina E. Joseph, Gregory P. Holly, H|J LAW, Minneapolis, Minnesota (for respondent)

Cathryn Middlebrook, Chief Appellate Public Defender, Julia Q. Brady, Assistant Public
Defender, St. Paul, Minnesota (for appellant)

Considered and decided by Bratvold, Presiding Judge; Ross, Judge; and Smith,
John, Judge.

* Retired judge of the Minnesota Court of Appeals, serving by appointment pursuant to
Minn. Const. art. VI, § 10.

NONPRECEDENTIAL OPINION

SMITH, JOHN, Judge

We affirm the district court’s revocation of the appellant’s stay of adjudication because the appellant did not have a liberty interest that prevented the district court from revoking the stay of adjudication, and the district court did not abuse its discretion in revoking the stay of adjudication.

FACTS

Appellant Taylor Ann Brown-Snyder pleaded guilty in November 2024 to gross-misdemeanor domestic assault, stemming from an altercation with her grandmother. At sentencing the district court stayed adjudication and placed Brown-Snyder on probation for two years. One of the probation conditions imposed was to “attend and comply with all mental[-]health court requirement[s].”

The mental-health court required Brown-Snyder to fulfill all mental-health court terms and conditions, attend support groups and domestic-abuse treatment, and successfully graduate from mental-health court. Brown-Snyder continued living with her grandmother.

In March 2025, during Brown-Snyder’s mental-health court hearing, respondent State of Minnesota requested the district court issue a domestic-abuse-no-contact order (DANCO), to protect the grandmother from Brown-Snyder due to “victim safety concerns.” The district court granted the request and issued the DANCO. In response, Brown-Snyder became argumentative, yelled profanities, and exited the courtroom before the hearing concluded.

At the next mental-health court hearing, Brown-Snyder was informed that her previous language and conduct would “not be tolerated.” Brown-Snyder was served the DANCO, which effectively prevented Brown-Snyder from living with her grandmother.

The next month, probation officers conducted a scheduled field visit with Brown-Snyder. In the subsequent probation-violation report, officers indicated that they mistakenly went to the grandmother’s house, not Brown-Snyder’s residence. Upon arrival, the officers discovered that Brown-Snyder had placed padlocks on the grandmother’s garage and home, “effectively restricting the [grandmother’s] access to her own residence.”

The report stated that the probation officers then went to Brown-Snyder’s residence. There, Brown-Snyder yelled at the probation officers, using derogatory language, and claimed that the district court was improperly handling her situation. The report further stated that, despite the officers’ attempts to deescalate the situation, they ultimately needed to leave for safety reasons. While leaving, Brown-Snyder continued to yell profane insults at the officers and slammed the door.

The district court terminated Brown-Snyder from mental-health court. The district court also scheduled a probation-violation hearing because Brown-Snyder failed to comply with all mental-health court terms and conditions, including successfully completing the program.

At the probation-violation hearing, Brown-Snyder admitted that she did not complete mental-health court. Brown-Snyder also submitted letters from her case workers regarding her mental-health progress. After reviewing the letters, the district court revoked Brown-Snyder’s stay of adjudication and imposed a stay of imposition of sentence. The

district court also ordered her to serve 60 days in the Ramsey County jail or on electronic home monitoring, leaving the choice up to probation, and imposed additional probation conditions, including attending therapy and mental-health counseling.

DECISION

Stay of Adjudication

Brown-Snyder argues that revoking a stay of adjudication is not an intermediate sanction under Minnesota law, and the defendant has a liberty interest in the stay of adjudication once imposed by the district court. Brown-Snyder asserts that because a defendant has a liberty interest in an imposed stay of adjudication, the district court erred in revoking her stay of adjudication without applying a factor-based test or additional fact-finding.¹ Statutory interpretation is a question of law, which Minnesota appellate courts review de novo. *State v. Barrientos*, 837 N.W.2d 294, 298 (Minn. 2013). Whether a defendant has been denied due process is a question of law reviewed de novo. *Beaulieu*, 859 N.W.2d at 280.

Intermediate Sanctions

Brown-Snyder argues that revoking a stay of adjudication is not an intermediate sanction under the plain language of Minnesota Statutes. When interpreting a statute, we aim to effectuate the intent of the legislature. Minn. Stat. § 645.16 (2024). To do so, we

¹ The state argues that because Brown-Snyder did not claim error at the probation-violation hearing, nor move for modification of her sentence, she is barred from raising the issue to this court. Yet, our rules state that a district court's probation-revocation decision is appealable. Minn. R. Crim. P. 27.04, subd. 3(4)(a); *see also State v. Beaulieu*, 859 N.W.2d 275, 278 (Minn. 2015) (reviewing probation-violation decision under a constitutional-violation theory not argued in district court).

apply canons of construction and the statute’s plain language to resolve any ambiguity. *State v. Powers*, 962 N.W.2d 853, 858 (Minn. 2021).

“[Minnesota Statutes] [s]ection 609.14 and Minnesota Rule of Criminal Procedure 27.04 generally address the consequences of a defendant’s violation of the conditions of probation or intermediate sanctions imposed by the district court.” *Barrientos*, 837 N.W.2d at 298. Under Minnesota Statutes section 609.14, subdivision 3(3) (2024), if the court determines that a probation violation occurred, it may “continue the stay [of adjudication] without intermediate sanctions, continue [the stay] with intermediate sanctions, or adjudicate guilt and proceed as otherwise provided.”²

[T]he term “intermediate sanctions” includes but is not limited to incarceration in a local jail or workhouse, home detention, electronic monitoring, intensive probation, sentencing to service, reporting to a day reporting center, chemical dependency or mental[-]health treatment or counseling, restitution, fines, day-fines, community work service, work service in a restorative justice program, work in lieu of or to work off fines and, with the victim’s consent, work in lieu of or to work off restitution.

Minn. Stat. § 609.135, subd. 1(b) (2024).

² The state asserts that this court’s nonprecedential case *State v. Thompson*, No. A17-0228, 2017 WL 4105216, at *2-3 (Minn. App. Sept. 18, 2017), established that revoking stays of adjudication are intermediate sanctions. There are two issues with this assertion. First, this nonprecedential case is not binding authority. *See* Minn. R. Civ. App. P. 136.01, subd. 1(c) (stating nonprecedential decisions have no binding authority beyond the specific case, *res judicata*, or collateral estoppel). Second, the legislature amended Minn. Stat. 609.14, subd. 3 in 2024 to include the above-stated wording. *See* 2024 Minn. Laws ch. 123, art. 6, § 12, at 2291. *Thompson* was issued seven years before the amendment. Thus, *Thompson* also lacks persuasive authority related to this issue.

The wording within section 609.14, subdivision 3(3), separates the continuation or revocation of a stay of adjudication from the imposition of an intermediate sanction. It identifies them as distinct actions. Similarly, section 609.135, subdivision 1(b) does not include the imposition of a stay within its list of intermediate sanctions. We recognize that the list “is not limited to” those specified. Yet, we interpret statutory lists under the doctrine of ejusdem generis—that “general language that follows a listing of specific subjects is presumed to be limited to subjects similar to those expressly listed.” *State v. Eide*, 898 N.W.2d 290, 295 (Minn. App. 2017); *accord State v. Sanschagrin*, 952 N.W.2d 620, 627 (Minn. 2020); *see also* Minn. Stat. § 645.08(3) (2024) (codifying ejusdem generis). The list provided by the legislature includes types of incarceration, work services, and probationary conditions; it does not include stays of sentencing, including a stay of execution, imposition, or adjudication. Based on the plain wording of Minnesota statutes, the revocation of a stay of adjudication is not an intermediate sanction.

Liberty Interest

Brown-Snyder argues that a defendant has a liberty interest in a stay of adjudication imposed by the district court. Both the United States and Minnesota Constitutions protect against deprivation of liberty without due process of law. U.S. Const. amend. XIV, § 1; Minn. Const. art. I, § 7. “A stay of adjudication . . . is a unique judicial tool.” *State v. Lee*, 706 N.W.2d 491, 494 (Minn. 2005). “[It] permits the district court to impose conditions of probation, including jail time, without a formal adjudication of guilt or the imposition of a sentence.” *State v. Greenough*, 915 N.W.2d 915, 918 (Minn. App. 2018) (quotation omitted).

The district courts have limited authority to order a stay of adjudication. *See State v. Martin*, 849 N.W.2d 99, 102 (Minn. App. 2014), *rev. denied* (Minn. Sept. 24, 2014). Specifically,

[e]xcept as provided in section 152.18, 609.1056, 609.375, or upon agreement of the parties, *a court may not refuse to adjudicate the guilt of a defendant* who tenders a guilty plea in accordance with Minnesota Rules of Criminal Procedure, rule 15, or who has been found guilty by a court or jury following a trial.

Minn. Stat. § 609.095(b) (2024) (emphasis added). Additionally, the courts may order a stay of adjudication to address injustice resulting from a prosecutor’s clear abuse of its discretion in the exercise of the charging function. *State v. Foss*, 556 N.W.2d 540, 541 (Minn. 1996).

This framework reflects the unique and special nature of a stay of adjudication. It is an extraordinary disposition authorized only by statute and permitted only upon the agreement of the parties or when judicial intervention is necessary to correct a clear abuse of the prosecutorial charging function. Given that a stay of adjudication is available only to a narrow class of defendants under limited conditions, it is difficult to conclude that a protected liberty interest arises from such a discretionary and circumscribed disposition.

Brown-Snyder argues that a defendant has a liberty interest because of the collateral consequences of the disposition. However, consequences come with committing the offense. *See State v. Twiss*, 570 N.W.2d 487, 487 (Minn. 1997) (stating that loss of job resulting from conviction is not a special circumstance allowing district court to stay adjudication; rather, “it is the sort of consequence that commonly attends a conviction of a

serious offense”). Indeed, we have rejected attempts to argue that collateral consequences justify granting a stay of adjudication. *See, e.g., State v. Angotti*, 633 N.W.2d 554, 557 (Minn. App. 2001) (concluding defendant’s potential loss of their business due to conviction is not a special circumstance allowing district court to order stay of adjudication over prosecutor’s objections); *State v. Leming*, 617 N.W.2d 587, 589 (Minn. App. 2000) (concluding same regarding defendant’s lack of criminal record). In other words, the collateral consequences of the defendant’s actions do not establish a liberty interest. Thus, a defendant does not have a liberty interest in a stay of their adjudication by the district court.

Because we conclude that a defendant does not have a liberty interest in a stay of adjudication, we need not reach the issue of whether a factor-based test is needed to protect the alleged liberty interest. As such, the district court did not err by revoking Brown-Snyder’s stay of adjudication without providing a detailed fact-finding explanation.

Abuse of Discretion

Brown-Snyder also argues that the district court abused its discretion by revoking her stay of adjudication. “The [district] court has broad discretion in determining if there is sufficient evidence to revoke probation and should be reversed only if there is a clear abuse of that discretion.” *State v. Austin*, 295 N.W.2d 246, 249-50 (Minn. 1980). “On appeal, the appellant has the burden of establishing that the district court abused its discretion and that appellant was thereby prejudiced.” *State v. Nowacki*, 880 N.W.2d 396, 399 (Minn. App. 2016) (quotation omitted). “A district court abuses its discretion when it acts arbitrarily, capriciously, or contrary to legal usage.” *Id.* (quotation omitted).

Here, Brown-Snyder was terminated from mental-health court. This termination prevented her from successfully graduating, which was a requirement of the program. The failure to comply with the program requirements was a violation of her conditions of probation. Upon admitting to the violation, the district court revoked the stay of adjudication. Based on the record, the district court did not abuse its discretion by revoking Brown-Snyder's stay of adjudication.

Brown-Snyder argues that the district court was not required to revoke her stay of adjudication under the terms of the plea agreement. However, there is nothing in the record indicating that the district court's decision to revoke the stay of adjudication was based on the plea deal; the record reflects only that it was based on the probation violation.

Brown-Snyder also argues that the district court's revocation of the stay of adjudication was unnecessary and should have addressed the violation with intermediate sanctions. This is a disagreement with the court's decision, not an argument that the district court abused its discretion in its decision. *See State v. Garland*, 942 N.W.2d 732, 742 (Minn. 2020) ("A district court abuses its discretion when its decision is based on an erroneous view of the law or is against logic and the facts in the record." (quotation omitted)). There was no abuse of discretion by the district court in revoking Brown-Snyder's stay of adjudication.

Affirmed.