



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2015-201A

Christine McEntire, Director
Oklahoma Real Estate Appraiser Board
3625 NW 56th Street, Ste. 100
Oklahoma City, Oklahoma 73112

December 9, 2015

Dear Director McEntire:

This office has received your request for a written Attorney General Opinion regarding agency action that the Oklahoma Real Estate Appraiser Board intends to take. The proposed action is to, pursuant to a consent order, require that licensee 11411CRA complete three courses in residential appraisal report preparation by June 2, 2016. The action would then impose probation terms including reports on appraisal activities for three months after completion of those courses. The action is a response to three complaints filed after the Board reviewed reports on appraisal activities generated during a prior probationary period.

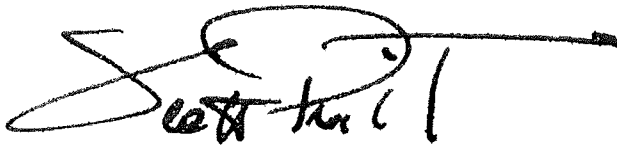
The first complaint involved an appraisal report with numerical errors and a lack of adequate analysis in several places, particularly in adjustment of values from comparable properties. The second complaint involved an appraisal report with numerical errors, a lack of analysis on the best use of the property, and a confusion of two comparable properties. The third complaint involved almost no analysis of a 400 square foot basement, numerical errors, and inadequate analysis of comparable properties.

The Oklahoma Certified Real Estate Appraisers Act, 59 O.S.2011 & Supp.2015, §§ 858-700–858-732, authorizes the Oklahoma Real Estate Appraiser Board to discipline licensees who violate “any of the standards for the development . . . of real estate appraisals as provided” in the Act, those who “[f]ail[] or refus[] without good cause to exercise reasonable diligence in developing an appraisal,” and those who display “[n]egligence or incompetence in developing an appraisal,” 59 O.S.Supp.2015, § 858-723(C)(6), (7), (8).

The action seeks to ensure that real estate appraisers maintain standards of diligence and professionalism, which is particularly important when appraisals will be relied upon by financial institutions extending credit. The Board may reasonably believe that, by offering licensee the opportunity to obtain additional education and then filing reports on appraisals after that education, the weaknesses in licensee’s appraisals may be corrected.



It is, therefore, the official opinion of the Attorney General that the Oklahoma Real Estate Appraiser Board has adequate support for the conclusion that this action advances the State of Oklahoma's policy to uphold standards of professionalism among real estate appraisers.

A handwritten signature in black ink, appearing to read "Scott Pruitt", with a long horizontal line extending to the right.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA