



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2019-147A

Christine McEntire, Director  
Oklahoma Real Estate Appraiser Board  
3625 N.W. 56th St., Ste. 100  
Oklahoma City, OK 73112

March 14, 2019

Dear Director McEntire:

This office has received your request for a written Attorney General Opinion regarding action that the Oklahoma Real Estate Appraiser Board intends to take pursuant to a consent order with respect to licensees listed in Exhibit A. The licensee each failed to complete required continuing education courses. The Board proposes to take the action listed in Exhibit A.

The Oklahoma Certified Real Estate Appraisers Act authorizes the Board revoke, suspend or otherwise discipline a licensee for “[f]ailing to meet the minimum qualifications established pursuant to the provisions of the Oklahoma Certified Real Estate Appraisers Act” *see* 59 O.S.Supp.2018, § 858-723(C)(2). The Act requires “completion . . . of the minimum number of classroom hours of instruction in courses or seminars according to the guidelines promulgated by the Appraiser Qualifications Board.” 59 O.S.2011, § 858-722(B). The rules promulgated by the Board requires all licensees to “successfully complete the seven (7) hour National USPAP Update Course, or an approved equivalent, every two calendar years.” OAC 600:10-1-7(d). The Board may reasonably believe that the proposed action is necessary to prevent future violations.

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’s policy to require real estate appraisers to complete a minimum amount of continuing education.

MIKE HUNTER  
ATTORNEY GENERAL OF OKLAHOMA

AMANDA OTIS  
ASSISTANT ATTORNEY GENERAL

**EXHIBIT A**

| <b>LICENSE NO.</b> | <b>FACTS OF CASE</b>                                       | <b>PROPOSED ACTION</b>   |
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| 11535CRA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 12878CRA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 91179TRA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 12817CGA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 10640CGA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 91148TRA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 13252CRA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 12727SLA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 12145SLA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 91132TRA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |
| 12410SLA           | Licensee failed to complete required continuing education. | The license is suspended until the Board receives a certificate of course completion for the course and the licensee pays a fine of \$150. |

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| 91171TRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 13029CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 12913SLA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 10555CGA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 10540CGA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 12887CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 10470CGA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 91160TRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 11263CGA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 91151TRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 10419CGA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 11590CRA | Licensee failed to complete required continuing education.  | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |

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|          | However, licensee has since completed the required course.  |   |
| 13249CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 10817SLA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 13299CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 13080CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 12566CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 10735CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 12787CA  | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 13315SLA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 12013CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 12794CGA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |
| 12489CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board. |

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| 12438SLA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board.            |
| 90843TRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board.            |
| 11469CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board.            |
| 91137TRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board.            |
| 91038TRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee was required to pay a fine of \$150, which the licensee has already remitted to the Board.            |
| 12641CRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee is required to pay a fine of \$150; the license is suspended until the fine is remitted to the Board. |
| 12047SLA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee is required to pay a fine of \$150; the license is suspended until the fine is remitted to the Board. |
| 12765CGA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee is required to pay a fine of \$150; the license is suspended until the fine is remitted to the Board. |
| 91147TRA | Licensee failed to complete required continuing education. However, licensee has since completed the required course. | The licensee is required to pay a fine of \$150; the license is suspended until the fine is remitted to the Board. |