



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2017-771A

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

November 3, 2017

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 in Grievance #'s A17-024, A17-023, A17-029, A17-021, and A17-022, each of which involves a registered appraisal management company (AMC). Each Grievance involves an AMC that has been disciplined in another state. The Board proposes to issue a letter of warning to each AMC.

The Oklahoma Appraisal Management Company Regulation Act authorizes the Board to regulate AMCs and the performance of appraisal management services in the State of Oklahoma. *See* 59 O.S.Supp.2016, §858-804; *see also* §858-802. The Act requires “[e]ach AMC...to...designate one controlling person that shall serve as the main contact for all communication between the Board and the AMC” and such person must “[n]otify the...Board of any discipline imposed by any other jurisdiction...in connection with any real property valuation activity[.]” *Id.* §858-810(A), (B)(5)(a). If an AMC is disciplined in another jurisdiction, the Board may impose discipline “which may be less or more severe than the discipline imposed by the other jurisdiction.” *Id.* §858-810(B)(5)(b). The Board may reasonably believe that the issuance of a letter of warning to the respective registrants is appropriate in light of the discipline imposed in other jurisdictions.

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 protect the public from economic and financial harm.

MIKE HUNTER
ATTORNEY GENERAL OF OKLAHOMA

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