



OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2024-20A

Grant Cody, Executive Director
Oklahoma Real Estate Commission
1915 N. Stiles Ave., #200
Oklahoma City, OK 73105

April 2, 2024

Re: Bunger, Case No. C-2023-275

Dear Director Cody:

This office has received your request for a written Attorney General Opinion regarding action that the Oklahoma Real Estate Commission (“OREC”) intends to take with respect to the Bunger.

The Oklahoma Real Estate License Code (“Code”) authorizes the Commission to impose sanctions, including revocation, on a licensee who displays “conduct which constitutes untrustworthy, improper, fraudulent, or dishonest dealings”; or “disregard[s] or violat[es] any provision of the [Code] or rules promulgated by the Commission.” 59 O.S.2021, § 858-312(8–9); *see also* OAC 605:10-17-5(2).

According to an OREC complaint, in July 2023, Respondent admitted to violating OREC rules by electronically signing transaction documents on behalf of out-of-state clients, without the clients’ consent and failing to promptly provide her clients with the Residential Property Condition Disclosure for execution. Finding clear and convincing evidence following a hearing before a hearing examiner and a review of the record, the OREC proposes to suspend Respondent’s license for one year, assess a \$2,000 fine and require three hours of continuing education classes. The OREC may reasonably believe that the proposed action is necessary to deter future violations and to protect the public.

It is, therefore, the official opinion of the Attorney General that the OREC has adequate support for the conclusion that this action advances the State’s policy to uphold standards of professionalism among real estate licensees.

A handwritten signature in blue ink, appearing to read "Rob Johnson".

ROB JOHNSON
GENERAL COUNSEL