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8  
9 **BEFORE THE**  
**DIRECTOR OF THE OFFICE OF REAL ESTATE APPRAISERS**  
**STATE OF CALIFORNIA**

10  
11  
12 In the Matter of the Accusation Against:  
13 **RANGE RICHARDSON**  
14 **3920 Thornhill Drive**  
**Sacramento, California 95826**  
15 Real Estate Appraiser License No. 028697  
16 Respondent.

Case No. C110830-03

**A C C U S A T I O N**

17  
18 Complainant alleges:

19 **PARTIES**

- 20 1. Elizabeth Seaters, acting on behalf of the Office of Real Estate Appraisers  
21 (Complainant), brings this Accusation solely in her official capacity as Chief of Enforcement for  
22 Complainant.  
23 2. On or about November 2, 2007, the Director of the Office of Real Estate Appraisers  
24 issued Certified Residential Appraiser License Number 028697 to Range Richardson  
25 (Respondent). The Certified Residential Appraiser License was in full force and effect at all  
26 times relevant to the charges brought herein and will expire on February 14, 2014, unless  
27 renewed.

**JURISDICTION**

1  
2           3.     This Accusation is brought before the Director of the Office of Real Estate Appraisers  
3 (Director), under the authority of the following laws. All section references are to the Business  
4 and Professions Code unless otherwise indicated.

5           4.     Business and Professions Code (“code”) section 11313 states, that “[t]he [O]ffice is  
6 under the supervision and control of the secretary. The duty of enforcing and administering this  
7 part is vested in the director and he or she is responsible to the secretary therefor. The director  
8 shall adopt and enforce rules and regulations as are determined reasonably necessary to carry out  
9 the purposes of this part. Those rules and regulations shall be adopted pursuant to Chapter 3.5  
10 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code.”

11           5.     Code section 11314 states, in pertinent part, that “[t]he [O]ffice is required to include  
12 in its regulations requirements for licensure and discipline of real estate appraisers that ensure  
13 protection of the public interest...”

14           6.     Code section 11316(a) provides, in pertinent part, that the “director may assess a fine  
15 against a licensee... for violation of this part or any regulations adopted to carry out its purposes”.

16           7.     Code section 11319 provides that the Uniform Standards of Professional Appraisal  
17 Practice (USPAP) constitute the minimum standard of conduct and performance for a  
18 licensee...etc.

19           8.     Code section 11409 provides, in pertinent part, that any person found to have  
20 committed a violation or violations of statutes or regulations relating to real estate appraiser  
21 practice to pay a sum of not to exceed the reasonable costs of investigation, enforcement, and  
22 prosecution of the case.

23           9.     California Code of Regulations, title 10, section 3721 states, in pertinent part:

24           (a) “The Director may..., suspend or revoke any license,... of any person who has:...

25                   (6) Violated any provision of USPAP.

26                   (7) Violated any provision of the Real Estate Appraisers' Licensing and Certification  
27 Law, Part 3 (commencing with Section 11300) of Division 4 of the Business and Professions  
28

1 Code, or regulations promulgated pursuant thereto; or any provision of the Business and  
2 Professions Code applicable to applicants for or holders of licenses authorizing appraisals.”

3 10. California Code of Regulations, title 10, section 3701 states, in pertinent part:

4 “Every holder of a license under this part shall conform to and observe the Uniform  
5 Standards of Professional Appraisal Practice (USPAP) and any subsequent amendments thereto  
6 as promulgated by the Appraisal Standards Board of The Appraisal Foundation which standards  
7 are herein incorporated into these regulations by reference as if fully set forth herein.”

8 11. California Code of Regulations, title 10, section 3702 states, in pertinent part:

9 “(a) The Director finds and declares as follows:

10 (1) That the profession of real estate appraisal is vested with a fiduciary relationship  
11 of trust and confidence as to clients, lending institutions, and both public and private guarantors  
12 or insurers of funds in federally-related real estate transactions and that the qualifications of  
13 honesty, candor, integrity, and trustworthiness are directly and substantially related to and  
14 indispensable to the practice of the appraisal profession.

15 ....

16 (3) Every holder of a license to practice real estate appraisal, Registrant, Controlling  
17 Person of an Appraisal Management Company, or person or entity acting in a capacity requiring a  
18 license or Certificate of Registration shall be required to demonstrate by his or her conduct that he  
19 or she possesses the qualifications of honesty, candor, integrity, and trustworthiness.”

20 12. California Code of Regulations, title 10, section 3705 states:

21 “(a) Every appraisal report subject to the Uniform Standards of Professional Appraisal  
22 Practice upon final completion shall bear the signature and license number of the appraiser and of  
23 the supervising appraiser, if appropriate. The affixing of such signature and number constitute the  
24 acceptance by the appraiser and supervising appraiser of full and personal responsibility for the  
25 accuracy, content, and integrity of the appraisal under Standards Rules 1 and 2 of USPAP.

26 (b) Every review appraisal report upon final completion shall bear the signature and license  
27 number of the reviewer. The affixing of such signature and number shall constitute acceptance by  
28 the reviewer of responsibility for the review under Standard Rule 3 of USPAP.

1 (c) The license number of the appraiser, and of the review appraiser if the report is a  
2 review, shall appear with each signature throughout the appraisal or review document.

3 Note: Authority cited: Sections 11313 and 11314, Business and Professions Code. Reference:  
4 Chapter 491 Statutes of 1991, Section 4; Business and Professions Code 11340(c); Section 1103  
5 of Public Law 101-73 (12 USC 3301, etc.) Title XI (Real Estate Reform Amendment); USPAP  
6 Ethics Provision, Record Keeping.

7 **UNIFORM STANDARDS OF PROFESSIONAL APPRAISAL PRACTICE (USPAP)**

8 **EFFECTIVE JANUARY 1, 2006- DECEMBER 31, 2007**

9 **Applicable to First through Sixth Causes for Discipline<sup>1</sup>**

10 13. USPAP Standards Rule 1-1 states in pertinent part:

11 “In developing a real property appraisal, an appraiser must:

12 (b) not commit a substantial error of omission or commission that significantly affects an  
13 appraisal.

14 ...”

15 14. USPAP Standards Rule 1-2 states in pertinent part:

16 “In developing a real property appraisal, an appraiser must:

17 (e) identify the characteristics of the property that are relevant to the type and definition of  
18 value and intended use of the appraisal, including:

19 (i) its location and physical, legal, and economic attributes.

20 ...”

21 15. USPAP Standards Rule 1-3 states in pertinent part:

22 “When necessary for credible assignment results in developing a market values opinion, an  
23 appraiser must:

24 (a) identify and analyze the effect on use and value of existing land use regulations,  
25 reasonably probable modifications of such land use regulations, economic supply and demand,  
26 the physical adaptability of the real estate, and market area trends.

27 <sup>1</sup> USPAP is periodically revised. Appraisers are responsible for adherence to the edition  
28 of USPAP in effect as of the date of report for an appraisal.

1 ...”

2 16. USPAP Standards Rule 1-4 states in pertinent part:

3 “In developing a real property appraisal, an appraiser must collect, verify, and analyze all  
4 information necessary for credible assignment results.

5 (a) When a sales comparison approach is necessary for credible assignment results, an  
6 appraiser must analyze such comparable sales data as are available to indicate a value conclusion.

7 ...”

8 17. USPAP Standards Rule 1-5 states in pertinent part:

9 “In developing a real property appraisal, when the value of the opinion to be developed is  
10 market value, an appraiser must, if such information is available to the appraiser in the normal  
11 course of business:

12 (a) analyze all agreements of sale, options, or listings of the subject property current as of  
13 the effective date of the appraisal.”

14 18. USPAP Standards Rule 2-1 states in pertinent part:

15 “Each written or oral real property appraisal report must:

16 (a) clearly and accurately set forth the appraisal in a manner that will not be misleading.

17 (b) contain sufficient information to enable the intended users of the appraisal to understand  
18 the report properly.

19 ...”

20 19. USPAP Standards Rule 2-2 states in pertinent part:

21 “Each written real property appraisal report must be prepared under one of the following  
22 three options and prominently state which option is used: Self-Contained Appraisal Report,  
23 Summary Appraisal Report, or Restricted Use Appraisal Report.

24 ...

25 (b) The content of a Summary Appraisal Report must be consistent with the intended use  
26 of the appraisal, and, at a minimum;

27 (iii) summarize information sufficient to identify the real estate involved in the appraisal,  
28 including the physical and economic property characteristics relevant to the assignment;

1 (vi) state the effective date of the appraisal and the date of the report;  
2 (viii) summarize the information analyzed, the appraisal methods and techniques employed,  
3 and the reasoning that supports the analyses, opinions, and conclusions; exclusion of the sales  
4 comparison approach, cost approach, or income approach must be explained.

5 ...”

6 20. USPAP Standards Rule 2-3 states:

7 “Each written real property appraisal report must contain a signed certification that is  
8 similar in content to the following form:

9 I certify that, to the best of my knowledge and belief:

- 10 — the statements of fact contained in this report are true and correct.
- 11 — the reported analyses, opinions, and conclusions are limited only by the reported  
12 assumptions and limiting conditions and are my personal, impartial, and unbiased professional  
13 analyses, opinions, and conclusions.
- 14 — I have no (or the specified) present or prospective interest in the property that is the  
15 subject of this report and no (or the specified) personal interest with respect to the parties  
16 involved.
- 17 — I have no bias with respect to the property that is the subject of this report or to the  
18 parties involved with this assignment.
- 19 — my engagement in this assignment was not contingent upon developing or reporting  
20 predetermined results.
- 21 — my compensation for completing this assignment is not contingent upon the  
22 development or reporting of a predetermined value or direction in value that favors the cause of  
23 the client, the amount of the value opinion, the attainment of a stipulated result, or the occurrence  
24 of a subsequent event directly related to the intended use of this appraisal.
- 25 — my analyses, opinions, and conclusions were developed, and this report has been  
26 prepared, in conformity with the Uniform Standards of Professional Appraisal Practice.
- 27 — I have (or have not) made a personal inspection of the property that is the subject of  
28 this report. (If more than one person signs this certification, the certification must clearly specify

1 which individuals did and which individuals did not make a personal inspection of the appraised  
2 property.)

3 — no one provided significant real property appraisal assistance to the person signing  
4 this certification. (If there are exceptions, the name of each individual providing significant real  
5 property appraisal assistance must be stated.)”

6 21. USPAP Conduct Section of the Ethics Rule states in pertinent part:

7 “To promote and preserve the public trust inherent in professional appraisal practice, an  
8 appraiser must observe the highest standards of professional ethics. This ETHICS RULE is  
9 divided into four sections: Conduct, Management, Confidentiality, and Record Keeping. The first  
10 three sections apply to all appraisal practice, and all four sections apply to appraisal practice  
11 performed under Standards 1 through 10.

12 Compliance with these standards is required when either the service or the appraiser is  
13 obligated by law or regulation, or by agreement with the client or intended users, to comply. In  
14 addition to these requirements, an individual should comply any time that individual represents  
15 that he or she is performing the service as an appraiser.

16 An appraiser must not misrepresent his or her role when providing valuation services that  
17 are outside of appraisal practice.

18 Conduct:

19 An appraiser must perform assignments ethically and competently, in accordance with  
20 USPAP and any supplemental standards agreed to by the appraiser in accepting the assignment.  
21 An appraiser must not engage in criminal conduct. An appraiser must perform assignments with  
22 impartiality, objectivity, and independence, and without accommodation of personal interests.

23 In appraisal practice, an appraiser must not perform as an advocate for any party or issue.

24 An appraiser must not accept an assignment that includes the reporting of predetermined  
25 opinions and conclusions.

26 An appraiser must not communicate results in a misleading or fraudulent manner. An  
27 appraiser must not use or communicate a misleading or fraudulent report or knowingly permit an  
28 employee or other person to communicate a misleading or fraudulent report.

1 An appraiser must not use or rely on unsupported conclusions relating to characteristics  
2 such as race, color, religion, national origin, gender, marital status, familial status, age, receipt of  
3 public assistance income, handicap, or an unsupported conclusion that homogeneity of such  
4 characteristics is necessary to maximize value.”

5 **UNIFORM STANDARDS OF PROFESSIONAL APPRAISAL PRACTICE (USPAP)**

6 **EFFECTIVE JANUARY 1, 2008- DECEMBER 31, 2009**

7 **Applicable to Seventh through Tenth Causes for Discipline**

8 22. USPAP Standards Rule 1-1 states in pertinent part:

9 “In developing a real property appraisal, an appraiser must:

10 ...

11 (b) not commit a substantial error of omission or commission that significantly affects an  
12 appraisal.

13 ...”

14 23. USPAP Standards Rule 1-2 states in pertinent part:

15 “In developing a real property appraisal, an appraiser must:

16 ...

17 (e) identify the characteristics of the property that are relevant to the purpose and intended  
18 use of the appraisal, including:

19 (i) its location and physical, legal, and economic attributes.

20 ...”

21 24. USPAP Standards Rule 1-3 states in pertinent part:

22 “When necessary for credible assignment results in developing a market value opinion, an  
23 appraiser must:

24 (a) identify and analyze the effect on use and value of existing land use regulations,  
25 reasonably probable modifications of such land use regulations, economic supply and demand,  
26 the physical adaptability of the real estate, and market area trends.

27 ...”

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25. USPAP Standards Rule 1-4 states in pertinent part:

“In developing a real property appraisal, an appraiser must collect, verify, and analyze all information necessary for credible assignment results.

(a) When a sales comparison approach is necessary for credible assignment results, an appraiser must analyze such comparable sales data as are available to indicate a value conclusion.  
...”

26. USPAP Standards Rule 1-5 states in pertinent part:

“When the value opinion to be developed is market value, an appraiser must, if such information is available to the appraiser in the normal course of business:

...  
(b) analyze all sales of the subject property that occurred with the three (3) years prior to the effective date of the appraisal.”

27. USPAP Standards Rule 2-1 states in pertinent part:

“Each written or oral real property appraisal report must:  
(a) clearly and accurately set forth the appraisal in a manner that will not be misleading.  
(b) contain sufficient information to enable the intended users of the appraisal to understand the report properly.  
...”

28. USPAP Standards Rule 2-2 states in pertinent part:

“Each written real property appraisal report must be prepared under one of the following three options and prominently state which option is used: Self-Contained Appraisal Report, Summary Appraisal Report, or Restricted Use Appraisal Report.  
...”

(b) The content of a Summary Appraisal Report must be consistent with the intended use of the appraisal, and, at a minimum;  
...”

1 (viii) summarize the information analyzed, the appraisal methods and techniques employed,  
2 and the reasoning that supports the analyses, opinions, and conclusions; exclusion of the sales  
3 comparison approach, cost approach, or income approach must be explained.

4 ...”

5 29. USPAP Standards Rule 2-3 states:

6 “Each written real property appraisal report must contain a signed certification that is  
7 similar in content to the following form:

8 I certify that, to the best of my knowledge and belief:

- 9 — the statements of fact contained in this report are true and correct.
- 10 — the reported analyses, opinions, and conclusions are limited only by the reported  
11 assumptions and limiting conditions and are my personal, impartial, and unbiased professional  
12 analyses, opinions, and conclusions.
- 13 — I have no (or the specified) present or prospective interest in the property that is the  
14 subject of this report and no (or the specified) personal interest with respect to the parties  
15 involved.
- 16 — I have no bias with respect to the property that is the subject of this report or to the  
17 parties involved with this assignment.
- 18 — my engagement in this assignment was not contingent upon developing or reporting  
19 predetermined results.
- 20 — my compensation for completing this assignment is not contingent upon the  
21 development or reporting of a predetermined value or direction in value that favors the cause of  
22 the client, the amount of the value opinion, the attainment of a stipulated result, or the occurrence  
23 of a subsequent event directly related to the intended use of this appraisal.
- 24 — my analyses, opinions, and conclusions were developed, and this report has been  
25 prepared, in conformity with the Uniform Standards of Professional Appraisal Practice.
- 26 — I have (or have not) made a personal inspection of the property that is the subject of  
27 this report. (If more than one person signs this certification, the certification must clearly specify  
28

1 which individuals did and which individuals did not make a personal inspection of the appraised  
2 property.)

3 — no one provided significant real property appraisal assistance to the person signing  
4 this certification. (If there are exceptions, the name of each individual providing significant real  
5 property appraisal assistance must be stated.)

6 30. USPAP Conduct Section of Ethics Rule states in pertinent part:

7 “To promote and preserve the public trust inherent in professional appraisal practice, an  
8 appraiser must observe the highest standards of professional ethics. This ETHICS RULE is  
9 divided into four sections: Conduct, Management, Confidentiality, and Record Keeping. The first  
10 three sections apply to all appraisal practice, and all four sections apply to appraisal practice  
11 performed under Standards 1 through 10.

12 Compliance with USPAP is required when either the service or the appraiser is obligated by  
13 law or regulation, or by agreement with the client or intended users, to comply. In addition to  
14 these requirements, an individual should comply any time that individual represents that he or she  
15 is performing the service as an appraiser.

16 An appraiser must not misrepresent his or her role when providing valuation services that  
17 are outside of appraisal practice.

18 Conduct:

19 An appraiser must perform assignments ethically and competently, in accordance with  
20 USPAP.

21 An appraiser must not engage in criminal conduct.

22 An appraiser must perform assignments with impartiality, objectivity, and independence,  
23 and without accommodation of personal interests.

24 An appraiser must not advocate the cause or interest of any party or issue.

25 An appraiser must not accept an assignment that includes the reporting of predetermined  
26 opinions and conclusions.

1 An appraiser must not communicate assignment results in a misleading or fraudulent  
2 manner. An appraiser must not use or communicate a misleading or fraudulent report or  
3 knowingly permit an employee or other person to communicate a misleading or fraudulent report.

4 An appraiser must not use or rely on unsupported conclusions relating to characteristics  
5 such as race, color, religion, national origin, gender, marital status, familial status, age, receipt of  
6 public assistance income, handicap, or an unsupported conclusion that homogeneity of such  
7 characteristics is necessary to maximize value.”

#### 8 FACTS

9 31. On or about November 4, 2007, Respondent completed an appraisal report with an  
10 effective date of November 1, 2007, on a residential property located at 120 Karla Way, Auburn,  
11 CA, 95603. This report was for the purpose of a loan transaction to purchase the subject property  
12 with a contract price of \$560,000. The report contained certain errors or omissions in violation of  
13 the Uniform Standards of Professional Appraisal Practice.

14 32. On or about April 8, 2008, Respondent completed an appraisal report with an  
15 effective date of April 8, 2008, on the same residential property located at 120 Karla Way,  
16 Auburn, CA, 95603. This report was for the purpose of an appraisal update (“recertification of  
17 value”). The report contained certain errors or omissions in violation of the Uniform Standards of  
18 Professional Appraisal Practice.

19 33. Subsequent to both the original appraisal order in November 2007 as set forth in  
20 paragraph 31 above and the April 2008 appraisal update as set forth in paragraph 32 above, a total  
21 of two loan transactions were recorded on the subject property.

#### 22 NOVEMBER 1, 2007 REPORT

#### 23 FIRST CAUSE FOR DISCIPLINE

24 (Failure to Completely Report and Analyze Listings on the Subject Property)

25 34. Respondent is subject to disciplinary action under section 3721 subdivision (a)(6) and  
26 (a)(7), by and through his violations of Regulations 3701, 3702 subdivision (a)(1) and (a)(3) and  
27 violations of S.R. 1-5(a) and S.R. 2-2(b)(viii) in the preparation of the November 1, 2007, report.

28 The circumstances are as follows:





1 certified that he complied with the listed certifications. However, Respondent's admissions of  
2 appraising to a predetermined value, coupled with evidentiary support from his own work file that  
3 he had access to information but failed to report or analyze the information, resulted in  
4 Respondent signing a false certification.

5 **APRIL 8, 2008 REPORT**

6 **SEVENTH CAUSE FOR DISCIPLINE**

7 (Failure to Adequately Report Market Conditions)

8 46. Respondent is subject to disciplinary action under section 3721 subdivision (a)(6) and  
9 (a)(7), by and through his violations of Regulations 3701, 3702 subdivision (a)(1) and (a)(3) and  
10 violations of S.R. 1-2(e)(i), S.R. 1-3(a), and S.R. 2-2(b)(viii) in the preparation of the April 8,  
11 2008, report. The circumstances are as follows:

12 47. On or about April 8, 2008, Respondent failed to report, analyze, and reconcile that the  
13 subject's Auburn market area had experienced a decline in median sales prices between the  
14 effective date of value of the original appraisal date (November 1, 2007) and the effective date of  
15 value of the Appraisal Update report (April 8, 2008) when he opined that the subject property had  
16 not declined in value over this time span.

17 **EIGHTH CAUSE FOR DISCIPLINE**

18 (Failure to Reconcile the Subject's Prior Sales Transaction)

19 48. Respondent is subject to disciplinary action under section 3721 subdivision (a)(6) and  
20 (a)(7), by and through his violations of Regulations 3701, 3702 subdivision (a)(1) and (a)(3) and  
21 violations of S.R. 1-5(b) and S.R. 2-2(b)(viii) in the preparation of the April 8, 2008 report. The  
22 circumstances are as follows:

23 49. On or about April 8, 2008, Respondent failed to report that the subject property had a  
24 closed sale between the date of the original appraisal and this appraisal update. The MLS records  
25 and Property Detail Report reported contradictory sales prices for the December 7, 2007, sale  
26 transaction. Respondent also failed to analyze and reconcile this contradictory information.

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1 **NINTH CAUSE FOR DISCIPLINE**

2 (Failure to Adequately Report and Analyze Relevant Information for the Reported Comparable  
3 Sales)

4 50. Respondent is subject to disciplinary action under section 3721 subdivision (a)(6) and  
5 (a)(7), by and through his violations of Regulations 3701, 3702 subdivision (a)(1) and (a)(3) and  
6 violations of S.R. 1-4(a) and S.R. 2-2(b)(viii) in the preparation of the April 8, 2008, report. The  
7 circumstances are as follows:

8 51. On or about April 8, 2008, Respondent failed to correctly report comparable sales  
9 when he failed to accurately report the custom built homes and upgraded features for the reported  
10 comparables. Respondent also failed to report any analysis of why he did not apply an age  
11 adjustment for reported comparables when they were all ten or more years newer than the subject  
12 property.

13 **TENTH CAUSE FOR DISCIPLINE**

14 (Failure to Perform the Appraisal Assignment Ethically)

15 52. Respondent is subject to disciplinary action under section 3721 subdivision (a)(6) and  
16 (a)(7), by and through his violations of Regulations 3701, 3702 subdivision (a)(1) and (a)(3) and  
17 violations of S.R. 1-1(b), S.R. 2-1(a), S.R. 2-1(b), S.R. 2-3, and the Conduct Section of USPAP  
18 Ethics Rule in the preparation of the April 8, 2008, report. The circumstances are as follows:

19 53. On or about April 8, 2008, as a result of the violations set forth in the Seventh  
20 through Ninth Causes for Discipline above, Respondent failed to perform the appraisal  
21 assignment ethically when, by his own admission, he accepted this appraisal assignment under the  
22 condition that he would appraise the subject property for a predetermined price with the intent of  
23 assisting the ordering party with successfully closing the transaction at the requested price.

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1 **PRAYER**

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
3 and that following the hearing, the Director of the Office of Real Estate Appraisers issue a  
4 decision:

5 1. Revoking or suspending Real Estate Appraiser License Number 028697, issued to  
6 Range Richardson.;

7 2. Ordering Range Richardson to pay the Director of the Office of Real Estate  
8 Appraisers the reasonable costs of the investigation and enforcement of this case, pursuant to  
9 Business and Professions Code section 11409;

10 3. Ordering Range Richardson to pay the Director of the Office of Real Estate  
11 Appraisers any fines assessed against his licensee for violation of the Business and Professions  
12 Code or any regulations adopted to carry out its purposes, pursuant to Business and Professions  
13 Code section 11316(a).

14 4. Taking such other and further action as deemed necessary and proper.

15  
16 DATED: 6/18/13

17  
18 ***Original Signed***

19 \_\_\_\_\_  
20 ELIZABETH SEATERS  
21 Chief of Enforcement  
22 Office of Real Estate Appraisers  
23 State of California  
24 *Complainant*

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