



OFFICE OF THE ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2024-16A

Christine McEntire, Director
Oklahoma Real Estate Appraiser Board
400 N.E. 50th St.
Oklahoma City, OK 73105-1816

March 13, 2024

RE: Sisco and Meyers, Complaint #22-036

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 against Respondents, Sisco and Myers. Sisco's certified real estate appraiser license expired December 2022, and Myers surrendered his training license in September 2022.

The Oklahoma Certified Real Estate Appraisers Act authorizes the Board, upon finding a violation of the Act or Board rules, to revoke an appraiser's certificate and order an appraiser to pay legal fees and costs expended by the Board. *See* 59 O.S.2021, § 858-723(A)(1), (9). The Act requires licensed appraisers to adhere to the Uniform Standards of Professional Appraisal Practice ("USPAP"), which contains professional requirements pertaining to ethics, competency, and scope of work. 59 O.S.2021, § 858-726. Further, the Board may discipline licensees who commit "[a]n act . . . involving dishonesty [or] fraud" intending to "benefit the [licensee] . . . or injure another person"; violate "any of the standards for the development or communication of real estate appraisals as provided in the . . . Act"; and "fail[] or refus[e] to exercise reasonable diligence in developing an appraisal, preparing an appraisal report or communicating an appraisal." 59 O.S.2021, § 858-723(C)(5–7).

According to a February 2023 Board complaint, Respondent Myers was licensed by the Board as a trainee appraiser working towards his full certificate.¹ At the committee's request for work product, Respondent Myers submitted an appraisal on a Tulsa property ("Myers's submission"). The appraisal was dated September 28, 2022, and was signed by Respondent Sisco, who was also listed as the supervising appraiser. Additionally, the appraisal noted that "[Repondent] Myers provided significant real property appraisal assistance." But the appraisal also showed through a checked "no" box that Respondent Sisco did not inspect the property despite signing that he did.

¹As part of Myers's training, a committee of the Board reviewed his work product.

The committee also subpoenaed bank records from the lending bank, specifically requesting a copy of the appraisal report for the same property.

Documents provided by the lending bank included two appraisal reports, an initial appraisal and a revised appraisal, both dated June 2022, and signed by Respondent Sisco (“Lender submission”). These appraisals noted that “no one provided significant real property appraisal assistance.” Further, a comparison between the Myers’s submission and Lender submission showed 226 total changes, including changes to the date, comments to the neighborhood, improvement, sales comparison and reconciliation sections, and an increased scope of work. As a result, the Board found clear and convincing evidence that Respondents embellished and supplemented the Myers’s submission, which included material misrepresentations to the Board from what was provided to the lending bank. The Respondents’ actions constitute violations of and failure to comply with the USPAP and, consequently, Oklahoma law pursuant to 59 O.S.2201, § 858-726. The Board proposes to revoke Respondent Sisco’s license; deny Respondent Myers’ application and withdraw the test card, rendering it void; and order payment of the costs of prosecution, to be paid within thirty days of the Order and split equally between Respondents. The Board may reasonably believe the proposed action is necessary to deter future violations and to protect the public welfare.

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 uphold standards of competency and professionalism among real estate appraisers.



Rob Johnson
General Counsel