

**JAY B. CLARK & ASSOCIATES**

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Appraisal Subcommittee  
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I am a Certified Residential Real Estate Appraiser in Arizona with 21 years of experienced and licensed since 1991. Like most appraisers in the Phoenix marketplace I try to do honest, high quality and lawful appraisal work. Unfortunately, there are a number of appraisers and "appraisal mills" that do not perform quality reports, are blatantly dishonest or, in many cases, used unlicensed trainees to perform appraisal reports.

I have sent a number of reports that have come across my desk over the years to the Arizona Board of Appraisal for review and possible disciplinary action. In all cases I have carefully documented the violations of appraisal standards as relates to the Uniform Standards of Professional Appraisal Practice (USPAP) and have documented errors, omissions, competency and ethics violations. With very few exceptions the Board has chosen to dismiss these complaints with as little as a "slap on the wrist" and in many cases no action, at all.

The appraisal community at large, especially those of us who have been actively trying to weed out the worst of our industry, have repeatedly been ignored or have been unsuccessful in obtaining any satisfactory information as to the reasons for lack of Board action.

It is nearly impossible to reach anyone by phone at the Board and it may take as much as a week to get a return phone call. The return call is almost never by the person for whom the message was left.

For all intents and purposes there is no communication between the appraisers and the Board. While it is possible to view minutes of the various Board meetings on line, the wait time for posting the minutes is typically several months. I had sent two emails to the board with specific questions in 2006 and have never received a reply to either one.

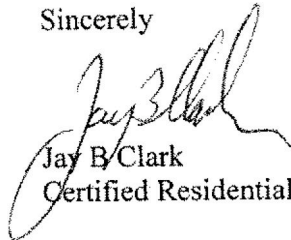
In the past two years there have been no revocations of any appraiser license by the Board and only two persons who chose to surrender their license rather than face litigation.

Many of us have asked for an audience with the Board at meetings to protest what we perceive as, at least, negligence and at worst, incompetence on the part of the Board members and their legal council from the Attorney Generals office. Nowhere in any of the 2005 or 2006 minutes is my, or any other appraisers comments and requests regarding the capricious and apparently arbitrary manner in which these complaints are handled.

I attended a class two weeks ago that was sponsored the Appraisal Institute and the National Association of Independent Fee Appraisers regarding Fraud Detection and many of the attending appraisers asked the same question, "why can't we get any action on these complaints and why are so many really bad appraisers still licensed?" The answer was that the Arizona Board is the "laughing stock of the nation" and that the lack of action on poor appraisal quality has attracted many from out of State to become loan officers and appraisers in Arizona. This is clearly not acceptable.

Thank you for your consideration. I hope the State of Arizona can fix this mess before the Federal Government feels the need to take over.

Sincerely



Jay B. Clark

Certified Residential Appraiser #20154