

VALLEJO & VALLEJO
REAL ESTATE APPRAISERS AND COUNSELORS

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August 27, 2001

Mr. Ben Henson
Executive Director
Appraisal Subcommittee
2000 K Street, NW
Suite 310
Washington, D.C. 20006-1809

Dear Mr. Henson:

I am enclosing a letter sent to me by the Government of Puerto Rico State Department's Office of Legal Affairs in response to my 8/6/01 letter to you, which is self-explanatory.

Apparently, everyone has forgotten, that during 1996 both the Puerto Rico Senate and the House of Representatives approved a compulsory association bill for the appraisers, mainly because of their lack of knowledge on the subject, only to force then Governor Rosello to veto the bill.

The Puerto Rico Real Estate Appraisers Board of Examiners is one (1) of twenty (20) plus Examining Boards that exist and operate under the State Department. As you well know, the State Department has traditionally and historically worked hand in hand with the Real Estate Appraisers Board of Examiners in achieving, its responsibilities, providing funding, administrative support and counseling, and making sure, that Board Members follow the correct administrative procedures and due process.

The issue at hand is not a real estate appraisal issue but a legal one, as the proposed legislation is contrary to Federal Law. The Board members are professional real estate appraisers, but have no legal expertise and/or faculty.

As such, I disagree with the Office of Legal Affairs that the issue of the compulsory association of appraisers in Puerto Rico is beyond the ministerial duties of the State Department to address and that the issue is just the concern of the appraisers and their, governing bodies. The State Department does have a responsibility in this very important matter, which could affect much more than the appraisal industry.

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The State Department should contact and educate both of Puerto Rico's Legislative bodies on the issue before it becomes a problem, given the large number of new Legislators since last year's election. By doing so, they will avoid putting Governor Calderón in the same situation former Governor Roselló found himself at in 1996.

Very truly yours,



LUIS E. VALLEJO

cc-

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