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Appraisal Subcommittee

Federal Financial Institutions Examination Council

September 30, 2002

Patrick Brady, Deputy Commissioner
Illinois Office of Banks and Real Estate
Real Estate Appraisal Administration
310 S. Michigan Avenue, Suite 2130
Chicago, IL 60604-4278

Dear Mr. Brady:

Thank you for your August 22, 2002 letter responding to our June 20th field review letter. We have reviewed your response and the enclosed complaint logs. The complaint logs submitted were easier to read and understand than the older logs we reviewed during our field review. We appreciate your explanation regarding the Office of Banks and Real Estate's ("OBRE") use of the terms "complaint," "case," and "merged." The explanation helps us better understand the statistics regarding complaint investigation and resolution.

After reviewing your letter and the enclosed complaint logs, we have some concern regarding complaints/cases that have been outstanding for more than one year. As noted in your letter, there are 28 complaints/cases outstanding from the years 1993 – 1999 (one in investigations and 27 in prosecutions); 14 complaints/cases outstanding from 2000 (one in investigations and 13 in prosecutions); and 16 complaints/cases outstanding from 2001 (five in investigations and 11 in prosecutions, most of which are close to or more than one year old). This totals 58 complaints/cases that have been outstanding for close to or more than one year.

ASC Policy Statement 10 provides that, absent special documented circumstances, final State administrative decisions regarding complaints/cases should occur within one year of the complaint filing date. To assist us in tracking these cases and analyzing OBRE's performance regarding complaint/case resolution, please identify complaint/case numbers for those complaints that remain open in investigations and those cases that are in prosecutions. Also, some cases listed in prosecutions have a "merged" status. If any of the 58 complaints/cases discussed in the preceding paragraph are merged, please identify by complaint/case number the complaints/cases that were included in the merged complaint/case. Additionally, if you could provide the log sheet information in electronic format (*e.g.*, delimited text file, spreadsheet, or database file), it would simplify our tracking and review process. For each of the 58 complaints/cases, please provide a brief description of the current status and planned actions leading toward resolution.

We appreciate your assistance in this matter. We, too, are pleased that communications and cooperation between the ASC and OBRE have improved.

Your response is requested within 60 days. Please contact us if you have any questions.

Sincerely,

Ben Henson
Executive Director