



Oregon

Theodore R. Kulongoski, Governor

Appraiser Certification and Licensure Board

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November 13, 2006

Appraisal Subcommittee
2000 K. Street, NW, Suite 310

DEC X 6 2006

Att: Virginia M. Gibbs, Chair

Dear Ms. Gibbs:

Thank you for your letter of September 26, 2006 which announced our compliance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, as amended. I also thank you for your recommendations regarding Mr. Keith's offering of courses with the approval and/or disapproval authority of those courses. As stated in your letter, we too believe that there is no evidence of inappropriate behavior or a conflict in Mr. Keith's actions. However, we have conferred with the Oregon Department of Justice and our General Counsel and have received legal advise concerning this.

If there is any perception of a conflict of interest wherein Mr. Keith is teaching or in any other way connected with a private education course, a Board member or the full Board will approve or disapprove any course or educational offering. This was passed with unanimous vote by the Board at our October 23, 2006 regular meeting. The wording of the unanimously carried motion is as follows:

"Courses submitted to the Board for approval will not be reviewed or approved by the Administrator, a board member, or staff when that person has helped to design that course or plans to participate in teaching the course. The authority to approve such a course will be exercised by a Board member as designated by the Board chair, who has no personal involvement in the course."

This motion was drafted by the Board's legal counsel and became Board policy by unanimous vote of the Board on October 23, 2006.

Again, thank you and your field representatives for a thorough and professional review of Oregon's Appraiser Licensing program. If you have any questions or further concerns, please don't hesitate to contact me personally.

Sincerely,

Craig Zell, Chair