

City BANK & TRUST COMPANY

November 30, 2017

To Whom It May Concern:

Pursuant to the notice from the Oklahoma State Banking Department regarding the Appraiser Waiver Request Process, we are requesting a temporary waiver of the appraiser certification and licensing requirements.

Our bank is located in Guymon, Oklahoma, in the center of the Oklahoma Panhandle. Guymon is located in Texas County. The other two (2) counties in the panhandle are Beaver County to the East and Cimarron County to the West. In comparison to the rest of the state we have a relatively sparse population. Our lending and trust management pertaining to real estate is primarily conducted in Texas County and to a lesser degree in the other two (2) panhandle counties.

There are presently six (6) licensed appraisers (see attached) in the Oklahoma panhandle. Of the six one is a trainee, two are certified general, and the other three are listed as State Licensed or Certified Residential appraisers. Of the two Certified General appraisers, the one we consider competent to do acceptable work has taken up to 8 months to produce appraisals for our trust properties and is not useful to us when considering commercial loan requests due to the length of time to produce an appraisal. This individual often declines appraisal requests. We are uncomfortable with the presentation and results of the other general appraiser. As a result we then have to obtain commercial appraisals from appraisers in Liberal, Kansas or Amarillo, Texas both well out of our area, and therefore unfamiliar with our area market. In both instances the cost is excessive and delays in obtaining the appraisals are similar to the other Oklahoma appraisers.

Our bank has on staff an individual who has maintained a Certified Residential Appraiser license until April 2017. This individual has provided acceptable appraisals and evaluations for the past 20 + years. He determined to allow his license to expire due to the rather burdensome CE requirements and the distance to and from approved courses within the state.

With the educational requirements, training process, number of hours required by the state, there is very little incentive for an individual to pursue obtaining an appraisal license. Most people cannot afford the time it takes to become licensed. Additionally, it is more difficult to find people in the Oklahoma Panhandle desiring to spend the time and effort to conduct appraisals in this sparsely populated part of the state.

Speaking for our bank in particular, we believe we have staff in the bank with lengthy experience in knowing our community. They have a good understanding of our local market, develop and document values and trends on an ongoing basis and are competent to produce evaluations and appraisals sufficient in nature to assure reliable valuations of real properties.

Therefore, we respectfully request that we be considered for a temporary waiver pertaining to the certification and licensing requirements.

Sincerely,

A handwritten signature in cursive script that reads "Robert D. Burgess".

Robert D. Burgess, VP

11-2-2017 APPRAISER ROSTER

LICENSE#	LAST NAME	FIRST NAME	TELEPHONE#	ADDRESS	QTY	ZIP CODE	COUNTY
10969CRA	Ford	Trent	918-696-9476	Rt 5 Box 740	Stilwell	74960-0000	Adair
10970CRA	Ford	Marshall	918-696-9612	RR 5 Box 740	Stilwell	74960-0000	Adair
11184CRA	Eversoll	Ted	918-696-2990	PO Box 227	Stilwell	74960-0000	Adair
10290CGA	Evans	Thomas	580-430-8106	31323 CR 720	Burlington	73722-0000	Alfalfa
91141TRA	Berry	Cassandra	580-884-5269	1103 Hadwiger Dr	Cherokee	73728-0000	Alfalfa
12219CGA	Daniel	Gary	580-889-5170	2478 E Roping Rd	Atoka	74525-0000	Atoka
12106SLA	Lansden	Darlene	405-226-2653	902 W First St	Beaver	73932-0000	Beaver
12471SLA	Brown	David	580-625-4396	PO Box 284	Beaver	73932-0000	Beaver
10831CRA	Cobb	Richard	580-225-6743	PO Box 982	Elk City	73648-0000	Beckham
11823CRA	Jackson	Jeffrey	580-225-4711	1501 Cloud Nine	Elk City	73644-0000	Beckham
11824CGA	McAbee	Shannon	580-225-4711	202 E 5th St	Elk City	73644-0000	Beckham
12323CRA	Burrows	Michelle	580-374-2360	223 S Highland Dr	Erick	73645-0000	Beckham
12706SLA	DeMoss	Mark	580-603-0318	PO Box 72	Okeene	73763-0000	Blaine
10457CGA	VanMeter	Martin	580-924-8404	PO Box 393	Durant	74702-0000	Bryan
10689CGA	Wylie	Wayne	580-924-3802	124 Holcomb Pl	Durant	74701-0000	Bryan
11180CRA	Hibbs	J Craig	580-775-0325	638 Bryan Road	Durant	74701-0000	Bryan
11519CRA	Dlessner	Gregory	580-775-0689	5417 Roadrunner Dr	Durant	74701-0000	Bryan
12260SLA	Manning	Ronald	580-931-7510	PO Box 5303	Durant	74702-0000	Bryan
12925CRA	Brewer	Derek	580-916-0638	1010 W Main St	Durant	74701-0000	Bryan
13068CRA	Marshall	David	720-436-2878	3016 Preston Wood	Durant	74701-0000	Bryan
13248SLA	Stegal	Jbel	580-434-2314	PO Box 552	Calera	74730-0000	Bryan
90503TRA	Sawson	Ronald	580-775-4341	700 Kin Kead Rd	McAlester	74501-0000	Bryan
90923TRA	Brittingham	Steven	580-775-5582	412 N 2nd Ave	Durant	74701-0000	Bryan
91093TRA	Childers	Molly	580-230-7670	11818 Leavenworth Trl	Mead	73449-0000	Bryan
91137TRA	Taylor	Jeremiah	580-271-1178	1701 W Beech St	Durant	74701-0000	Bryan
91160TRA	Fields	Tyler	580-745-9499	1024 W Willow St	Durant	74701-0000	Bryan
10164CGA	Paxton	Michael	405-247-1159	1323 Nile Professional Park	Anadarko	73005-0000	Caddo
10801CRA	Matlock	Alvin	405-222-7979	205 Chickasha Ave Ste 7	Chickasha	73018-0000	Caddo
11214CGA	Hatfield Jr	Robert	405-247-1159	1323 Nile Professional Park	Anadarko	73005-0000	Caddo
11263CGA	Fodder	Fred	405-247-1159	1323 Nile Professional Park	Anadarko	73005-0000	Caddo
12905CRA	Mindemann	Tina	580-588-3323	PO Box 455	Apache	73006-0000	Caddo

11-2-2017 APPRAISER ROSTER

LICENSE#	LAST NAME	FIRST NAME	TELEPHONE#	ADDRESS	CITY	ZIP CODE	COUNTY
12805CRA	Barnes	Ryan	479-739-2442	PO Box 723	Muldrow	74948-0000	Sequoyah
13069CRA	Russell	Rickey	479-653-4805	471389 E 1140 Rd	Muldrow	74948-0000	Sequoyah
10034CGA	Emery	Robert	580-541-5691	3014 Timbercreek Ct	Duncan	73533-0000	Stephens
10312CRA	Perkins	Keith	580-467-0941	1503 B Brookwood Ave	Duncan	73533-0000	Stephens
10500CRA	Beebe	Barbara	580-255-1221	1111 W Willow	Duncan	73533-0000	Stephens
10651CRA	Parr	Lynn	580-255-5166	PO Box 1957	Duncan	73534-0000	Stephens
11207CRA	Pollock	Rodney	580-467-7481	RR 5 Box 104	Marlow	73055-0000	Stephens
91040TRA	Hickenbottom	Richard	405-204-0957	1108 W Plato Rd Apt 49	Duncan	73533-0000	Stephens
91156TRA	Arrington	Braylin	580-251-5475	2041 W Gatlin Rd	Duncan	73533-0000	Stephens
10050CGA	Howell	Tillman	580-468-1000	PO Box 1325	Guymon	73942-0000	Texas
11375CGA	Bagley	Rene	580-338-0957	RR 2 Box 83	Guymon	73942-0000	Texas
11760CRA	Whitford	Jonalyn	580-338-2396	23 Quail Run	Guymon	73942-0000	Texas
91120TRA	Elliott	Bryan	580-521-1771	Rt 1 Box 39	Texhoma	73949-0000	Texas
91121TRA	Wilson	Jbel	580-349-1246	Rt 1 Box 10C	Goodwell	73939-0000	Texas
10001CGA	VanTuyt	Terry	918-284-4200	10938 E 76th St	Tulsa	74133-0000	Tulsa
10007CGA	Adwon	Adam	918-742-7311	7018 S Sandusky Ave	Tulsa	74136-0000	Tulsa
10026CRA	Cooper	Carol	918-496-2924	6732 S Lewis Ave Unit 304	Tulsa	74136-0000	Tulsa
10027CGA	Coulter	Michael	918-640-9848	3845 E 104th St	Tulsa	74137-0000	Tulsa
10033CGA	Ellis II	F. Richard	918-357-9396	1304 E Boston St	Broken Arrow	74012-0000	Tulsa
10044CGA	Glass	Timothy	918-744-5744	1703 E Skelly Dr Ste 101	Tulsa	74105-0000	Tulsa
10045CGA	Gordon	Janice	918-633-3333	4307 S Atlanta Ave	Tulsa	74105-0000	Tulsa
10069CGA	Lawrence	Kelly	918-492-4844	1323 E 71st St Ste 105	Tulsa	74136-0000	Tulsa
10095CGA	Schmook	John	918-492-5846	2601 E 75th St	Tulsa	74136-0000	Tulsa
10096CRA	Schneider	Carl	918-607-6694	6924 S 76th E Ave	Tulsa	74133-0000	Tulsa
10107CGA	Story III	John	918-610-1135	10011 E 39th St	Tulsa	74146-0000	Tulsa
10109CGA	Turney	Brent	918-260-2237	1780 E 59th Pl	Tulsa	74105-0000	Tulsa
10121CGA	Gray	Robert	918-492-4844	1323 E 71st St Ste 105	Tulsa	74136-0000	Tulsa
10132CRA	Goswick	Phillip	918-481-0528	8827 S 72nd E Ave	Tulsa	74133-0000	Tulsa
10135CRA	Allen	Thomas	918-481-3500	PO Box 702438	Tulsa	74170-0000	Tulsa
10140CRA	Gray	Michael	918-557-6580	3847 S Troost Ave	Tulsa	74105-0000	Tulsa
10150CRA	Sotts	Larry	918-636-0466	3843 S Gary Pl	Tulsa	74105-0000	Tulsa

Appraiser Waiver Request Process

placeholder text.
Bank Board Meeting:
November 15, 2017

During the recent Oklahoma Bankers Association visit to Washington, DC, Federal Reserve Board Deputy Director Maryann Hunter described options available to financial institutions dealing with appraiser shortages and difficulty getting timely appraisals. Ms. Hunter explained that the federal appraisal laws allow for a temporary waiver of the appraiser certification and licensing requirements – thereby giving institutions access to more individuals eligible to complete the required appraisals.

Credit Union Board Meeting:
November 15, 2017

In order to obtain a temporary waiver, the requesting bank must provide evidence of the shortage of appraisers in the area and must demonstrate that the scarcity of appraisers has led to significant delays in the performance of appraisals in that area. If the waiver is granted, the requirement to use a certified or licensed appraiser would be waived for all regulated institutions engaging in federally related transactions in the affected geographic area, regardless of who initially requested the waiver.

A waiver request must include information such as

- A description of all significant problems currently being encountered in efforts to comply with the appraisal requirement;
- The nature of the scarcity of certified or licensed appraisers;
- The extent of the delays experienced in obtaining the services of certified or licensed appraisers;
- The reasons why the requester believes that the requirement or requirements are causing the scarcity of certified or licensed appraisers and the service delays.

The complete regulatory procedure for requesting a waiver may be found at Title 12 Code of Federal Regulations, Part 1102. [12 CFR Part 1102](#)

pictured above: Federal Reserve Board Deputy Director Maryann Hunter and Oklahoma Bank Commissioner Mick Thompson

Please Note:

The email address from which this communication was sent is not monitored for responses. You may send responses to regina.rainey@banking.ok.gov instead. Thank you.

Support Us!

CFR › Title 12 › Chapter XI › Part 1102 › Subpart A › Section 1102.2

12 CFR 1102.2 - Requirements for requests.

§ 1102.2 Requirements for requests.

A request will not be deemed received by the ASC unless it fully and accurately sets out:

- (a) If the requester is a State Appraiser Regulatory Agency, a written, duly authorized determination by the State Appraiser Regulatory Agency that there is a scarcity of State licensed or State certified appraisers leading to significant delays in obtaining appraisals in federally related transactions. The scarcity can relate to the entire State or to particular geographical or political subdivisions. In the absence of such a written determination, a State Appraiser Regulatory Agency must ask the ASC for such a determination;
- (b) The requirement or requirements of State law from which relief is being sought;
- (c) A description of all significant problems currently being encountered in efforts to comply with title XI;
- (d) The nature of the scarcity of certified or licensed appraisers (including supporting documentation);
- (e) The extent of the delays anticipated or experienced in obtaining the services of certified or licensed appraisers (including supporting documentation);
- (f) The reasons why the requester believes that the requirement or requirements are causing the scarcity of certified or licensed appraisers and the service delays; and
- (g) A specific plan for expeditiously alleviating the scarcity and the service delays.

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