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December 15, 2017

James R. Parks
Executive Director
Appraisal Subcommittee of the FFIEC
1401 H. Street NW, Suite 760
Washington, DC 2005
jim@asc.gov

RE: Temporary Waiver of Appraiser Requirements for City Bank & Trust Co in Guymon, OK

Dear Mr. Parks:

I have read the November 30, 2017 letter written by Robert "Bob" D. Burgess, VP of City Bank & Trust Company in Guymon, Oklahoma requesting a temporary waiver of appraiser requirements. Before a decision is made on this request, I think some background information needs to be explained.

I first moved to Guymon in 1994. I moved to Nebraska for two years from 2007 until 2009 at which time I moved back. Bob Burgess has been employed with said bank since prior to 1994 and was a certified appraiser until April 2017 when he did not renew his license. Bob is retirement age and currently works part-time at the bank.

Below is a history of my appraisal assignments as an independent fee appraiser with said bank.

1997-2004	3 Single-Family Residential Assignments for mortgage loan purposes
2009	2 Commercial Assignments for mortgage loan purposes
2010-2017	20-25 Appraisal Assignments for the Trust Department

My general turn-around time is three months; however, it has taken longer for recent assignments due to some family medical issues this year. My father, an active farmer, passed away from cancer; my mother has health issues requiring frequent doctor visits; and my daughter had two surgeries. Because the appraisal assignments that City Bank requests for the Trust Department do not contain due dates, I admit that I have pushed a court ordered or mortgage loan assignment ahead of it. I have not accepted any single-family mortgage loan appraisals since 2010.

This past year, Bob inquired about a commercial appraisal for mortgage loan purposes. And due to my work load at the time and family medical issues, I could not accept said assignment due to

not being able to meet the deadline. I do not recall any other commercial appraisal request for a mortgage loan since the two that I performed in 2009.

There is another certified general appraiser in Guymon and two in Liberal, Kansas, which is 40 miles away. Each of us has an appraiser trainee. The list below shows the number of appraisers in the area and distance from Guymon.

- Guymon, OK Local 2 CG 1CR
- Liberal, KS 40 miles 2 CG 3 CR
- Spearman, TX 60 miles 1 CG
- Beaver, OK 60 miles 2 Lic
- Dumas, TX 75 miles 1 CR
- Fritch, TX 90 miles 1 CG
- Clayton, NM 90 miles 2 CG 1 CR
- Laverne, OK 100 miles 1 CR
- Pampa, TX 105 miles 3 CG 1 Lic
- Garden City, KS 110 miles 6 CG 1 CR 2 Lic
- Woodward, OK 120 miles 3 CG 1 CR 1 Lic
- Amarillo, TX 120 miles 18 CG 18 CR

Furthermore, it is not uncommon for appraisers as far away as Lubbock (245 miles) and Abilene Texas (360 miles) to contact me because they are appraising property in the area.

In Bob's waiver request, he does not mention the out of state appraisers of which many have an Oklahoma certification. There may be few appraisers in this area; however, there does not appear to be significant delays in appraisal services for federally related transactions (FRTs).

During the time that Bob had an appraiser's license, City Bank had a competitive advantage over the other local banks in closing transactions quicker. Since Bob allowed his license to expire, this advantage no longer exists. It appears that City Bank is trying to regain its competitive edge by waiving the appraiser requirement.

Also, the *Guymon Daily Herald*, reported on November 4, 2017 that TS Banking Group of Treynor, Iowa has entered into an agreement with Docking Bancshares, Inc. to acquire City Bank. It is unknown if the appraiser waiver request is part of the transaction.

I hope this letter explains the appraiser climate in the Guymon area so you can make an informed decision on the appraiser waiver request. Please contact me if you have any questions.

Sincerely,


Rene' G. Bagley
Oklahoma Certified General Appraiser, #11375CGA