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REAL PROPERTY CONSULTANTS

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2-4-2022

Nevada Commission of Appraisers
Written Public Comment

Commissioners, following is a lot of information on Hybrid Appraisals. But I will cut to the chase upfront. Regardless of professional competence or USPAP compliance, Nevada Appraiser law is very specific. The law states the definition of an appraiser as follows. "Appraiser" means a person who prepares or communicates an appraisal, but does not include anyone who merely relays an appraisal on behalf of the person who prepares it." The law further requires that licensure for appraiser's is mandatory. The law states, "Any person who, in this State, **engages in the business of, acts in the capacity of**, advertises **or assumes to act as**" an appraiser is requires by law to be licensed or certified. A person inspecting a property to determine the relevant characteristics for an appraisal is acting as an appraiser and is required by law to be licensed or certified. I find no exceptions in the law.

RE; Hybrid Appraisal

What Are Hybrid Appraisals?

A hybrid appraisal, also referred to as a bifurcated appraisal, is a type of report in which a third party (usually another appraiser or a **real estate agent**) will complete the in-person inspection of both the interior and exterior of the subject property.

Then, they will report their findings to the appraiser, who will gather data from public records, the MLS and other sources to complete the appraisal and report their opinion of the property's value.

A hybrid appraisal is a lot like a traditional appraisal, **but instead of the appraiser** doing both the **inspection of the home** and the appraisal report, the process is split into two parts that are each completed by a different person. Hence the name "bifurcated."

When a hybrid appraisal is used for a property valuation, **a third party will visit the property and complete the physical inspection of the home**, noting its condition, features, size, location and **any other factors that are relevant to the property's value (This requires appraisal expertise)**.

This property data collector will look at both the inside and outside of the home, and **they'll collect the same type of data, (This requires appraisal expertise).** that's used to complete a traditional appraisal.

The difference with a hybrid appraisal is that the person who visits the home – who may be a property inspector, real estate agent, appraiser trainee or even another licensed appraiser – will turn over the data they collect to the appraiser, who will complete the valuation on the property. **Someone who inspects a property to determine the "relevant characteristics" of that property is acting as an appraiser. Acting as an appraiser in the State of Nevada requires you to be Licensed or Certified.**

The appraiser will then complete their part of the process using the data collected by the third party, as well as public records, their local multiple listing service (MLS) and other sources to complete the appraisal report. They'll choose comparable sales, or comps, to help determine the market value of the property they're appraising.

This process allows the appraiser to focus on the valuation, which is where their expertise and experience lies.

NRS 645C.040 "Appraiser" defined. "Appraiser" means a person who prepares or communicates an appraisal, but does not include anyone who merely relays an appraisal on behalf of the person who prepares it.

(Added to NRS by 1989, 822)

NRS 645C.140 Purpose of chapter. The purpose of this chapter is to carry out the policy expressed in the portion of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (12 U.S.C. §§ 3331-3351) which concerns appraisers, to establish a program in this state **to license and certify appraisers, and to protect the users of appraisals in this state**.

(Added to NRS by 1989, 823; A 1991, 887)

NRS 645C.150 Applicability of chapter. The provisions of this chapter do not apply to:

1. A federal or state employee, or an employee of a local government, who prepares or communicates an appraisal as part of his or her official duties, unless a license or certificate is required as a condition of that employment.
2. A person appointed to evaluate real estate pursuant to chapter 152 of NRS or NRS 269.125, except as required by the appointing judge.
3. A board of appraisers acting pursuant to NRS 269.135.
4. A person licensed pursuant to chapter 645 or 684A of NRS, or certified pursuant to chapter 645D of NRS, while performing an act within the scope of his or her license or certificate.
5. A person who makes an evaluation of real estate as an incidental part of his or her employment for which special compensation is not provided, if that evaluation is only provided to the person's employer for internal use within the place of his or her employment.
6. A person who makes an assessment of the value of property in connection with a judicial proceeding for eminent domain brought pursuant to chapter 37 of NRS.

(Added to NRS by 1989, 823; A 1991, 887; 1997, 1797; 2005, 522)

NRS 645C.260 Certificate, license, permit or registration card required; penalty; prosecution of violation.

1. Any person who, in this State, **engages in the business of, acts in the capacity of**, advertises **or assumes to act as**:

(a) An appraiser without first obtaining the appropriate certificate, license or permit pursuant to this chapter; or

(b) An intern without first obtaining a registration card pursuant to this chapter,

Ê is guilty of a misdemeanor.

2. The Division may file a complaint in any court of competent jurisdiction for a violation of this section, and assist in presenting the law or facts at any hearing upon the complaint.
3. At the request of the Administrator, the Attorney General shall prosecute such a violation. Unless the violation is prosecuted by the Attorney General, the district attorney shall prosecute a violation which occurs in the district attorney's county.

(Added to NRS by 1989, 826; A 1991, 889)

USPAP 2020-2022

Advisory Opinion 2 pages 68-71 lines 73-131

Purpose of an Inspection

The primary reason for inspecting the subject property is to gather information about the characteristics of the property that **are relevant to its value.**

What are relevant characteristics in appraisal report?

Relevant characteristics are, in simplest terms, **things that can add significant value to a specific type of home in a specific location**. **(This requires appraisal expertise)** They can dramatically alter a property's marketability and are therefore, very important when it comes to assessing a home's worth.

Relying on an Inspection Performed by Someone Else In some cases, the client may provide the appraiser with the results of an inspection performed by a third party, or the appraiser may hire a third party to perform the inspection. Whether the inspection is performed by the appraiser, another appraiser, or a third-party inspector, **an appraiser must ensure that the degree of inspection is sufficient for the appraiser to understand the subject property's relevant characteristics**, so the appraiser can develop a credible appraisal. Therefore, in cases when the appraiser relies upon a third-party inspector's report, it may be necessary to obtain additional information and/or examine other documents in order to understand the relevant characteristics of the property. In all cases, when adequate information about **relevant characteristics** is not available through a personal inspection or from sources the appraiser reasonably believes are reliable, the appraiser must:

• modify the assignment conditions to expand the scope of work to include gathering the necessary information;

• use an extraordinary assumption about such uncertain information, if credible assignment results can still be developed; or

• withdraw from the assignment.

Disclosure Requirements Appraisal reports for real and personal property must contain a signed certification indicating whether the appraiser has or has not personally inspected the subject property. All appraisal reports must also contain **sufficient information** to enable the intended users **to understand the extent of the inspection** that was performed. If the appraiser relies on inspection information from another appraiser (e.g., photographs, aerial footage, inventory, etc.), and the information constitutes **significant appraisal assistance**, the inspector must be identified in the Certification as having provided significant appraisal assistance. Further, the extent of the assistance must be indicated within the report. Because of the variability of inspections, the appraisal report should clearly communicate the degree of the inspection for the report to be meaningful.

Illustration:

3. A client has asked me to perform an appraisal, but instead of requiring me to physically inspect the subject, they will provide me with the results of an inspection of the property done by someone else. Does USPAP allow this?

Yes. USPAP does not require an appraiser to inspect the subject per the SCOPE OF WORK RULE. However, while an inspection is not required, appraisal reports for real and personal property must contain a signed certification that clearly states whether the appraiser personally inspected the subject. Standards Rules 1-2(e) and 7-2(e) **require an appraiser to identify, from sources the appraiser reasonably believes to be reliable, the characteristics of the property that are relevant to the type and definition of value and the intended use of the appraisal, including its legal and economic characteristics**. In a real property appraisal assignment, an appraiser may use any combination of a property inspection, documents, such as a legal description, address, map reference, copy of a survey or map, property sketch, photographs, or other information to **identify the relevant characteristics** of the subject property. In a personal property appraisal, an appraiser may use any combination of a property inspection, documents, or other information to identify the relevant characteristics of the subject property. Standards Rules 1-1(b) and 7-1(b) require that an appraiser not commit a substantial error of omission or commission that significantly affects an appraisal. Therefore, the appraiser has to have a reasonable basis to believe the information contained in the inspection report provided by the client is credible, or must seek additional information, which could include interviewing the inspector or gathering data from other sources. If uncertainties remain, but the appraiser can still develop credible assignment results, the appraiser may need to use an extraordinary assumption regarding the decision to rely on the information

contained in the third-party inspection report. **An appraiser must not allow assignment conditions to limit the scope of work to such a degree that the assignment results are not credible in the context of the intended use. If an appraiser determines that the only way to meet these criteria is by personally inspecting the property, he or she must either discuss changing the scope of work with the client, or withdraw from the assignment.**

USPAP 2020-2022 Definitions page 5

PERSONAL INSPECTION: a physical observation performed to assist in **identifying relevant property characteristics in a valuation service**.

Comment: An appraiser's inspection is typically limited to those things readily observable without the use of special testing or equipment. Appraisals of some types of property, such as gems and jewelry, may require the use of specialized equipment. An inspection by an appraiser is not the equivalent of an inspection by an inspection professional (e.g., a structural engineer, home inspector, or art conservator).

USPAP 2020-2022 SCOPE OF WORK ACCEPTABILITY page 14

An appraiser must not allow assignment conditions to limit the scope of work to such a degree that the assignment results are not credible in the context of the intended use.

Comment: If relevant information is not available because of assignment conditions that limit research opportunities (such as conditions **that place limitations on inspection** or information gathering), an appraiser must withdraw from the assignment unless the appraiser can:
• modify the assignment conditions to expand the scope of work to include gathering the information; or
• use an extraordinary assumption about such information, if credible assignment results can still be developed.

USPAP 2020-2022 FAQ page 283

229. PERSONAL INSPECTION TIMING (NEW)

Question: Both the DEFINITION of Personal Inspection and the SCOPE OF WORK RULE refer to **identifying relevant characteristics**. If I personally inspect a property to collect data about those relevant characteristics, am I "locked in" to only collect information about those relevant characteristics I previously identified, or may I identify additional relevant characteristics based on what I've learned from my **personal inspection**?

Response: First, it is important to remember that USPAP does not require a personal inspection at all. Furthermore, if you do perform a personal inspection, USPAP does not dictate when in the process it must occur. An appraiser typically identifies the assignment elements (including the subject of the assignment and its relevant characteristics) at the beginning of an assignment in order to develop an initial Scope of Work and to establish the business terms of the engagement. However, an appraiser's Scope of Work can and often does evolve during the appraisal process based upon information gathered as a result of research and analysis. Thus, an appraiser may identify relevant property characteristics at various stages of an assignment, which could occur prior or subsequent to a personal inspection, if one is performed.

293. DOES USPAP REQUIRE DISCLOSURE OF ASSISTANCE BY A NON-APPRAISER? (NEW)

Question: A client has asked me to perform an appraisal, but instead of requiring me to personally inspect the subject, they will provide me with the results of an inspection of the

property done by someone else. Does USPAP require me to disclose this person's name as having provided significant appraisal assistance and describe the assistance they provided?

Response: Generally, no. If the information provided in the inspection only includes factual data regarding the subject, then significant appraisal assistance has not been provided. **However, if the appraiser relies upon opinions and conclusions of the inspector regarding quality, condition and/or functional utility, then this qualifies as significant appraisal assistance. (Which requires a licensed or certified appraiser in the State of Nevada)** In this case, if the individual performing the assistance is an appraiser, then yes, you must disclose the inspector's identity and also describe the assistance. It is a misconception that non-appraisers who provide assistance must be identified in the certification. The certification requirements in USPAP apply only to appraisers.

Even if disclosure is not required because an individual providing information is not an appraiser, the appraiser relying on such information still has obligations pertaining to the information used.

First, it's important to remember that the appraiser signing the certification is taking full responsibility for the appraisal. The Comment to Standards Rule 2-3(b) states, in part:

> In an assignment that includes only assignment results developed by the real property appraiser(s), any appraiser who signs a certification accepts full responsibility for all elements of the certification, for the assignment results, and for the contents of the appraisal report…

Second, Standards Rule 2-3(c) states:
(c) When a signing appraiser has relied on work done by appraisers and others who do not sign the certification, the signing appraiser is responsible for the decision to rely on their work.

(i) The signing appraiser is required to have a reasonable basis for believing that those individuals performing the work are competent; and

(ii) The signing appraiser must have no reason to doubt that the work of those individuals is credible.

Comment: Although a certification must contain the names of individuals providing significant real property appraisal assistance, it is not required that a summary of the extent of their assistance be located in a certification. This disclosure may be in any part(s) of the report.

Standard Rule 1-2(e), one of the first steps in the development of an appraisal, requires the appraiser to identify the relevant characteristics of the property. If the scope of work requires that the appraiser consider physical aspects that they would not already know without inspecting the property, the source and accuracy of this information becomes critically important.

The Appraisal Foundation USPAP neither requires nor prohibits the disclosure of the name of a non-appraiser inspector or the source of the inspection data.

How Is A Hybrid Appraisal Different From A Desktop Appraisal?

Both hybrid and desktop appraisals have utilized technology to make the appraisal process faster and more efficient.

Desktop appraisals are typically done completely remotely, meaning that no physical, in-person inspection of the property has been done. Appraisers completing this type of valuation will use all available data on a property to formulate their opinion of value.

Using public records and MLS data, for example, an appraiser can learn about the age of a home, its square footage, the number of bedrooms and bathrooms and other relevant data points. Then, they can look at recently sold homes in the neighborhood with these same characteristics (also known as comps) to help them form an opinion of the property's value.

What Data Is Collected During A Hybrid Appraisal?

The person completing the in-person inspection of the home will look at the home's interior and exterior and document all of its characteristics and features (Which is acting as an appraiser in the State of Nevada). They'll make a note of everything from the home's design style to the age and condition of its heating and cooling systems.

Then, in addition to the information provided by this third-party inspector, the appraiser will do their own research, using both market-level and property-specific data to complete their valuation of the home. Where exactly does this data come from? An appraiser may use data from a property inspection, plans and specifications, public records, engineering reports and photos of the property, according to the Appraisal Foundation, which sets the standards for real estate valuations via the Uniform Standards of Professional Appraisal Practice (USPAP).

It's important to note that even though the process is different from a traditional appraisal, hybrid appraisals are held to the same standards as traditional appraisals, and an appraiser completing a hybrid valuation needs to base their opinion of a property's value on the same facts and data that would be used in a traditional appraisal.

What Are Hybrid Appraisals Used For?

In the past, hybrid appraisals have been more commonly used for servicing purposes, not for purchasing and refinancing. But that may be changing as consumers, lenders and investors look to make the appraisal process more efficient.

Some common reasons a lender might utilize a hybrid appraisal include updating a loan value, assessing how a loan is performing or in the case of pre-foreclosure or foreclosure.

There's been more of a push in recent years to move towards more flexible appraisal options, including hybrid appraisals, for home purchases and refinances. With COVID-19, for example, the Federal Housing Finance Agency (FHFA), which oversees major mortgage investors Fannie Mae and Freddie Mac, has temporarily allowed for nontraditional, low-contact solutions, including desktop appraisals and drive-by appraisals, which enable appraisers to complete valuations without risk of exposure to others.

Why Are Hybrid Appraisals Popular?

Hybrid appraisals are becoming increasingly popular because they're faster, more efficient and better utilize an appraiser's expertise.

Hybrid appraisals benefit appraisers by limiting their scope of work and making better use of their skill sets. Instead of having them drive out to take measurements and photos, appraisers can stay at their desks and focus on the higher-level work of analyzing the property and performing the valuation.

The Bottom Line

What's important for home buyers, homeowners and home sellers to understand is that hybrid appraisals rely on the same information that traditional appraisals do. The professionals involved in evaluating the property you're buying, selling or refinancing must be in compliance with the appraisal standards set forth by USPAP, regardless of the type of appraisal they're doing.

Sincerely,



Anthony J. Wren MAI, SRA
Certified General Appraiser #A.0000090-CG

QUALIFICATIONS OF

ANTHONY J. WREN, MAI, SRA
REAL ESTATE APPRAISER

PROFESSIONAL DESIGNATIONS: MAI – Member Appraisal Institute* 1991
SRPA – Senior Real Property Appraiser* 1987
SRA – Senior Residential Appraiser* 1984

* These are no longer considered to be acronyms by the Appraisal Institute

PROFESSIONAL INVOLVEMENT:

- Re-Appointed by the Governor of Nevada to serve on the Nevada State Board of Taxation, Current Member 11/19 to 10/23
- Appointed by the Governor of Nevada to serve on the Nevada State Board of Taxation, Current Member 5/16 to 10/19
- Appointed by the Governor of Nevada to serve on the Nevada State Board of Equalization, Chairman as of January 2009 3/08 to 3/12

  Reappointed to a new term and Chair 3/12 to 10/15
- Appointed by the Governor of Nevada to serve on the Nevada Commission of Appraisers 9/94 to 6/97 and 7/97 to 6/00
- President, Commission of Appraisers of Real Estate, State of Nevada (1996, 1998)
- Expert Witness for Nevada District Court, Washoe, Storey, Clark and Elko Counties
- Member of the Appraisal Institute, National Board of Realtors, and Reno/Carson/ Tahoe Board of Realtors
- Over 45 years of Appraisal Experience

APPRAISAL LICENSE: Nevada Certified General Appraiser
#A.0000090-CG

REAL ESTATE BROKERAGE: Nevada Real Estate Brokerage Licensed Broker
Anthony J. Wren #B.0023456.INDV.

OFFICES HELD: *Member* Young Advisory Council SREA,
San Diego & San Francisco, CA 1989 & 1991

Education Chairman, Reno/Tahoe/Carson Chapter
Appraisal Institute 1993

Board of Directors, Reno/Carson/Tahoe Chapter Appraisal
Institute 1993-2007
President, Reno/Carson/Tahoe

Chapter 189	1988-1989
First Vice President, Reno/Carson/Tahoe Chapter 189	1987-1988
Secretary, Reno/Carson/Tahoe Chapter 189	1986-1987
President, Reno/Carson/Tahoe Chapter 189	2000

Appraisal Instruction

4 Hour Nevada Assessors Ethics Class		2021
Several USPAP Update Courses taught through		2020
Business Practices and Ethics		2020
15-Hour National USPAP		2018
Comparison Valuation of Small, Mixed-Use Properties		2011
Income Valuation of Small, Mixed-Use Properties		2011
15-Hour National USPAP Course		03/23/07
15-Hour Standards of Professional Practice (Seattle, WA)		03/22/07
7-Hour National USPAP Update (Las Vegas, NV)		03/02/07
7-Hour National USPAP Update (Chicago, IL)		04/15/05
7-Hour National USPAP Update (Reno, NV)		02/24/05
USPAP Update 2003 – Standards & Ethics for Professionals		09/05/03
Business Practices and Ethics		07/25/03
7-Hour National USPAP Update Course		05/02/03
15-Hour National USPAP		03/22/03
Appraisal Procedures		05/19/01
Sales Comparison Valuation of Small, Mixed-Use Properties		03/31/01
Standards of Professional Practice, Part B (USPAP)		02/10/01
Income Valuation of Small, Mixed-Use Properties		02/19/00
Standards of Professional Practice, A, B, & C, USPAP Reno, NV, Casper, WY, Eugene, OR, Sacramento, CA, Las Vegas, NV		1992–2003
Income Valuation of Small Mixed Use Properties		
(Reno, NV)		1998
(Casper, WY)		1999
(Sacramento, CA)		1999
Residential Case Study, Course 210	(Las Vegas, NV)	10/97
Alternative Residential Reporting Forms	(Buffalo, WY)	09/97
(Polson, MT)		09/97
Data Confirmation and Verification	(Richland, WA)	11/96
(Riodoso, NM)		09/96
(Reno, NV)		03/96
(Savannah, GA)		12/95
Understanding the Limited Appraisal	(Savannah, GA)	12/95
(Tucson, AZ)		09/94
110 “Real Estate Appraiser Principles”	(Minneapolis, MN)	07/99
(Sacramento, CA)		05/95
(Wenatchee, WA)		09/94

(St. Louis, MO)		02/94
(Las Vegas, NV)		05/94
URAR Update	(Casper, WY)	01/94
(Reno, NV)		12/93
1A2 Basic Valuation Procedures	(Las Vegas, NV)	05/92
Course 207B, Income Valuation Appraising	(Reno, NV)	Fall 1989
Truckee Meadows Community College	(Reno, NV)	Spring 1989

APPRAISAL COURSES AUDITED:

Case Studies in Real Estate Valuation	1991
Cost Valuation of Small, Mixed-Use Properties	1988
Income Valuation of Small Mixed-Use Properties	
Sales Comparison Valuation of Small, Mixed-Use Properties	

APPRAISAL COURSES SATISFACTORILY CHALLENGED:

A1: Course I210 Residential Case Studies	(1993)
A1: Course 410 Standards of Professional Appraisal Practice	(1991)
A1: Course 420 Ethics of the Professional Appraisal Practice	(1991)
A1: Course 420 Ethics of the Professional Appraisal Practice	(1991)
SREA: Course 301 Special Applications of Real Estate Analysis	(1989)
SREA: Course 202 Applied Income Property Valuation	(1985)
SREA: Course 201 Principles of Income Property Appraising	(1984)
SREA: Course 101 An Introduction to Appraising Real Property	(1983)
SREA: Course 102 Applied Residential Property Valuation	(1983)

Classes Taken Online

The Basics of Expert Witness for Commercial Appraisers	2021
Supporting your adjustments	2021
Introduction to the Uniform Dataset (2 hours)	2019
USPAP Instructor Recertification Course 2018-2019 (4 hours)	2018
USPAP Instructor Recertification Course 2016-2017 (4 hours)	2016
USPAP Instructor Recertification Course 2014-2015 (4 hours)	2014

Classes Attended

Rapid Response; Market Analysis in Volatile Markets	2021
Uniform Appraisal Standards for Federal Land Acquisition	2017
2018-2019 Instructors Recertification Course (USPAP)	2017
Architectural Styles and the UAD	2017
Constructing the Profession Report	2017
FHA SFR Appraising -Handbook 4000.1	2017
Comprehensive Square Foot Calculations	2017
2016-2017 USPAP Instructor Recertification Course	2015
Business Practice and Ethics Instructor Training	2015
Tahoe Litigation Conference	2014
Evaluating Residential Construction	2014
Appraisal Review General	2012
Uniform Appraisal Standards for Federal Land Acquisitions (Phoenix, AZ)	12/17 & 18/09
Valuation of Easements and Other Partial Interests (Reno, NV)	12/04/09
General Market Analysis and Highest & Best Use (Las Vegas, NV)	08/31/09 – 09/03/09

Introduction to International Valuation Standards (Online)	08/01/31 – 08/31/09
Valuation of Green Residential Properties (Phoenix, AZ)	02/19/09
REO Appraisal: Appraisal of Residential Property Foreclosures (Las Vegas, NV)	10/11/08
Forecasting Review	10/10/08
AQB Awareness Training for Appraisal Institute Instructors (Online)	08/15/07
Committee CE Credit (Chapter Level)	12/31/09
AQB USPAP Instructor Recertification Course (Dedham, MA)	02/24/07
AQB USPAP Instructor Recertification Course (Tucson, AZ)	12/04/04
Water Rights in Nevada	2/01/03
Training & Development Conference	08/26/03
AQB USPAP Instructor Recertification (San Francisco, CA)	10/30/02
Appraisal Continuing Education	12/10/02
Property Flipping and Predatory Lending Seminar	10/17/01
2001 USPAP Update for Instructors & Regulators-CA (San Diego, CA)	12/09/00
Lake Tahoe Case Studies in Commercial Highest & Best Use (Sacramento, CA)	10/20/00
Supporting Sales Comparison Grid Adjustments for Residential Properties (Reno, NV)	09/29/00
Case Studies in Commercial Highest and Best Use (Reno, NV)	07/28/00
Tools For Teaching Excellence, Day 1	07/09/00
USPAP Update for Instructors and Regulators (Las Vegas, NV)	07/08/00
Tools For Teaching Excellence, Day 2	07/10/00
Residential Consulting	03/31/00
Residential Consulting	2000
FHA's Home buyer Protection Plan & the Appraisal Process Seminar	1991
Affordable Housing Valuation Seminar	1997
Alternative Residential Reporting Forms	1986
Business Valuation Part 1	1996
Understanding Limited Appraisals – General	1995
Data Confirmation & Verification Methods	1995
Mandatory Faculty Workshop	1995
Appraising 1- to 4-Family Income Properties	1995
Investment Techniques with the HP-17/19II Calculator	1994
Fair Lending and the Appraiser	1994
Mock Trial	1994
Electronic Spreadsheet Workshop	1994
Basic Argus Training (Spreadsheets)	1994
Investment Techniques with the HP-17/19II Calculator	1994
FNMA URAR Update	1993
Maximizing the Value of an Appraisal Practice	1993
Litigation Valuation	1992
101 "Instructors Clinic	1990
Comprehensive Appraisal Review	1990

Meetings Attended

Committee Credit – National	12/31/00

FORMAL EDUCATION:

University of Texas at Arlington (No Degree)	1974
Casper College (No Degree)	1973
Peacock Military Academy (High School)	1972