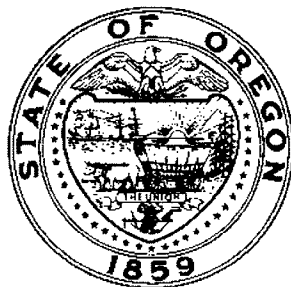


May 1, 2013 Report
to
Legislative Assembly
Required by Senate Bill 1587
(2012 Session)



Appraiser Certification
and
Licensure Board

A Semi-Independent Agency

May 1, 2013
Report to Legislative Assembly
From the Appraiser Certification and Licensure Board
A Semi-independent State Agency

Introduction

The Appraisal Subcommittee (ASC) of the Federal Financial Institution Examination Council has been charged by the United States Congress with the responsibility for oversight for all state appraiser regulatory boards/agencies. As part of this oversight, the ASC performs biannual three-day on-site audits to ensure compliance with Federal law. These audits include ensuring that each state's entire system for processing and investigating complaints and sanctioning appraisers is administered in an effective, consistent, equitable and well-documented manner. For the past 12 years, the ASC findings from Board audits have been very favorable. Most recently, during their July 2012 audit (covering 2010 – 2012) ASC Auditor Jenny Tidwell stated, she "found the Board is consistent and equitable in their handling of enforcement cases." ASC Auditor Vicki Metcalf stated, "that they consider Oregon to be one of the top appraisal licensing programs in the country."

Concerns have been expressed that the Board, in its investigation process, considers violations beyond those identified in the complaint. Federal Appraisal Subcommittee (ASC) requires that the Board "must analyze each complaint to determine whether additional violations, especially those relating to USPAP, should be added to the original complaint."¹ As a result, the Board is required by federal regulation to consider whether violations occurred other than those specified in the original complaint. The Board has no authority to change ASC Policies.

SB 1587 requires that the Appraiser Certification and Licensure Board (Board) submit a report to the Legislative Assembly in the manner required by ORS 192.245. The lettered paragraphs in this report correspond to the lettered paragraphs in Section 2 of SB 1587.

SB 1587 also requires certain data within "the last year" and/or "during the previous two years" be included in the report. However, the bill does not define whether the intent is calendar year, fiscal year, or the time frame immediately proceeding the date the report is required. For purposes of the data and statements made in this report, the ending benchmark date for the required reporting periods is April 30, 2013.

2(a) The Board's Procedures for Dispute Resolution

As defined in SB 1587, dispute resolution means a case or complaint handled by the Appraiser Certification and Licensure Board that was filed by the board*, an appraiser, or property owner against the appraiser. In addition to complaints filed by the Board, an appraiser or property owner the Board also investigates complaints from other sources such as anonymous complainants, consumers other than property owners (borrowers, clients, appraisal management companies) Realtors, lenders, and government agencies. All sources of complaints are included in this report.

¹ See Appraisal Subcommittee Policy Statement 10, Section E, first paragraph. This Policy Statement can be accessed at <https://www.asc.gov/Statement10.aspx>

- * Since July 1, 2003, 14% of all complaints filed were initiated by Board members or the Board administrator.

Last year, the Board modified its dispute resolution process. Please refer to ACLB Compliance Process Flow Chart (Exhibit 1).

(A) Specific examples in which the board has been successful and unsuccessful in dealing with dispute resolution

Dispute Resolution Summary

For purposes of this report, the Board provides the following definitions:

- “Successful” dispute resolution - Case resolved through negotiations and the Respondent has not requested a contested case hearing
- “Unsuccessful” dispute resolution - Case in which the Respondent has requested a contested case hearing and the case is resolved through negotiation some time during the contested case process or as a result of an Administrative Law Judge’s findings

Since becoming a semi-independent agency in 2001, the Board has processed 28 contested case hearing requests, six of which went through the entire hearing process. The Board consistently prevailed at each hearing adjudicated by an Administrative Law Judge. Of the 28 cases noted, five remain active as of the date of this report.

Successful Dispute Resolution Explanation and Specific Examples

The Board is charged with enforcement of national minimum professional standards known as the Uniform Standards of Professional Appraisal Practice (USPAP). If the Board believes that potential violations of ORS Chapter 674, OAR Chapter 161 or USPAP (incorporated by OAR 161-025-0060) have occurred, Board staff will make a written report of their findings, inform the Respondent of their right to legal counsel, provide the Respondent with a copy of those findings, outline the options for resolution (Exhibit 2), and give the Respondent the opportunity to determine how they wish to proceed. When the Respondent chooses to settle the case rather than initiate the contested case hearing process, the terms of the settlement are negotiated and mutually agreed upon by the Board and the Respondent. The terms are then memorialized in a final order that is signed by the Respondent and a Board designee, and ratified by the Board at a public Board meeting.

The Board endeavors to resolve cases in the most effective way possible and with the least cost to all parties involved. As a result, the vast majority of complaints are resolved through a mutually agreed upon settlement between the Board and the Respondent.

Unsuccessful Dispute Resolution and Specific Examples

When a dispute is not resolved through a mutually agreed upon settlement, the Board issues a Notice of Proposed Disciplinary Action and proceeds with the contested case hearing process in compliance with the Oregon Administrative Procedures Act. In such cases, Board staff works closely with a Senior Assistant Attorney General (assigned by the Department of Justice) to ensure that proper protocol is followed. It is worthy to note that many Respondents that request a contested case hearing often enter into settlements prior to the conclusion of the hearing process.

(B) Recommendations for addressing deficiencies in the dispute resolution procedures

Implementation of Pre-Screening Process

Prior to January 31, 2013, the Board established each complaint received as provided by OAR 161-006-0160. This rule afforded the Board no opportunity to pre-screen complaints and required that virtually all complaints from all sources be forwarded to the appraiser who was then required to make a written response to the complaint and provide to the Board a copy of their appraisal report and supporting work file.

Historically, over 40% of all complaints received have been dismissed. The Board attributes the dismissal rate largely to the expertise of the Board and Board staff. Board staff includes three appraiser licensees with an average of 20 years of professional appraisal experience. Four of the nine nationally certified Uniform Standards of Professional Appraisal Practice (USPAP) instructors in Oregon are either Board members or employees of the Board. USPAP education is a pre-license and continuing education requirement for all appraisers in the country. National requirements dictate that only nationally certified USPAP instructors are permitted to teach USPAP to appraisers. These credentials are important considering the federal (ASC) requirements that state appraiser boards “must analyze each complaint to determine whether additional violations, especially those relating to USPAP, should be added to the complaint” (see footnote on page 1). This is important not only for identifying what “is” a violation, but also what “is not” a violation.

Unfortunately, even though these complaints were dismissed after investigation, the appraiser must report the mere fact that a complaint had been filed to their professional liability insurance carriers and to potential clients during the application process to procure those new clients. This resulted in an unintended “black-mark” on the appraiser’s record and essentially penalized the appraiser when no violation(s) had been found by the Board to exist.

Effective January 31, 2013, the rules were amended to include OAR 161-006-0155 Allegation Reports. The addition of this rule provides a pre-screening mechanism to determine whether issues presented in the Allegation Report represent reasonable grounds to *establish* a formal complaint against a Respondent. The new process allows the Board to dismiss any allegation report that does not include evidence or fact to establish proof of a violation. Implementation of this rule relieves the appraiser of the unintended consequences related to liability insurance and the client procurement process while preserving public trust.

(C) The number of times in the preceding two years that the board has used the dispute resolution procedures

The dispute resolution procedures described herein have been utilized in *all* cases brought before the Board.

During the preceding two years, the Board has addressed a total of 166 complaints. The Board deemed 129 complaints to be valid (Exhibit 3). Of these complaints, 30 did not rise to a level requiring disciplinary action and were dismissed with a letter of counsel.

(D) Whether there is a panel that reviews each complaint submitted to the board to determine the legitimacy of the complaint

Within the last year, the Board established an Enforcement and Oversight Committee. The Vice-Chair of the Board, a nationally certified USPAP instructor, is the chair of the Committee. This three-member committee is responsible for the oversight of the Board's complaint processing and enforcement activities including whether an objective basis exists that a violation has occurred and to make a recommendation to the Board whether to initiate disciplinary action.

Prior to implementation of this committee, these functions were performed by the Board's Administrator and Compliance Coordinator who both hold the Certified General credential, the highest appraiser credential issued by the Board, and are also nationally certified USPAP Instructors.

2(b) Board Procedures Related to Conflicts of Interest Among Board Members, including:

(A) Guidelines set by the Oregon Government Ethics Commission

The Oregon Government Ethics Commission (OGEC) addresses issues related to a Board member's risk of potential or actual conflicts of interest. All Board members are required to attend on-line training offered by the OGEC. In addition, all Board members completed a two-hour ethics training class focusing on the conflict of interest issue as presented by OGEC staff during the April 22, 2013 Board meeting.

(B) The procedure for removing a board member when a conflict of interest exists

In the event that a conflict of interest among Board members is alleged, the Board will seek guidance from the OGEC and the Department of Justice to ensure that proper protocol is followed, to investigate and, if appropriate, remove the board members involved in the conflict.

(C) Recommendations for addressing deficiencies in conflict of interest procedures

The Board will follow legal counsel and OGEC recommendations for addressing deficiencies, as they are discovered, in the conflict of interest procedures.

(D) How many conflicts of interest have occurred in the last two years

There have been no conflicts of interest that have occurred in the last two years.

2(c) The Current Process by Which a Person Becomes an Appraiser

The process to become an appraiser is summarized on the Board's website (see www.oregonaclb.org click on "Becoming an Appraiser"). The summaries address the following for each licensing level as well as initial qualifications to become a Registered Appraiser Assistant: 1) educational requirements; 2) required experience; and 3) testing procedures.

OAR Chapter 161, Divisions 10, 15, and 20 (see www.oregonaclb.org click on "Rules and Statutes") provide a comprehensive description of requirements for each license and certification level as well as Supervising Appraiser Endorsement criteria; the application and examination processes; and educational courses, requirements and providers.

(A) Whether the Board has identified any barriers to becoming certified or licensed as an appraiser

The board has identified the following barriers to becoming certified or licensed as an appraiser:

- Nationally mandated qualification criteria set forth by the Appraiser Qualification Board of the Appraisal Foundation (www.appraisalfoundation.org).

These criteria include: specified appraisal education (150 to 300 hours of classroom time), supervised appraisal experience (2,000 to 3,000 hours) over a minimum of 12 to 30 months, college degree (for certified appraisers not licensed appraisers) and the successful completion of a four to six hour national appraiser examination. (Ranges indicated reflect the criteria differences between the three appraisal credential levels.)

- Reduced market demand for appraisal services resulting from the weakness of the state's real estate market and overall economy. Poor market conditions result in less demand for appraisal services which and has the potential to affect the amount an appraiser charges for appraisal services. Since April 2007, the Board has experienced 20 consecutive quarters of decline in the appraiser population for an aggregate decline of 18.3% since that time.

The real estate market volatility and an appraiser's reduced income, in turn, severely diminish an appraiser's financial ability to take on the responsibility of becoming a Supervising Appraiser for a Registered Appraiser Assistant.

- An appraiser's reluctance to become a Supervising Appraiser, hire and train a Registered Appraiser Assistant, only to have the trainee become a licensee and leave their employ before the Supervising Appraiser realizes a return on their investment of time, resources and finances required to provide the necessary training.

(B) The purpose of any barriers the board has identified

The nationally mandated qualification criteria are established for the protection of public trust in the appraisal profession. The appraisal profession is a value-opinion business. The public needs to be able to trust that those individuals upon whom the State confers an appraiser credential have met minimum qualification criteria to earn that credential and to identify himself or herself as an appraiser. Similarly, the public needs to be able to trust that the value opinions provided by credentialed appraisers have been developed and reported in compliance with the USPAP.

(C) How many appraisers are employed in this state

The Board has no method by which to identify the number of licensees that are actually employed. Most appraisal practitioners are very small independent business owners for which there are no standard reporting requirements. Therefore, the Board can verify only the number of appraisers that are actively licensed or certified by the Board. As of the date of this report, there are 1,425 appraisers who hold an active license or certification.

(D) How many appraisers have been suspended or reprimanded in the last two years

During the previous two years, three appraiser licensees have been suspended and two have been reprimanded.

(E) How many people apply for certification or licensure each year?

During the previous year, the Board received 56 appraiser applications.

For purposes of comparison, the Board received 82 appraiser applications from May 1, 2011 through April 30, 2012.

(F) Recommendations for reducing barriers to entry into the appraisal field

The Board identified certain barriers to becoming certified or licensed as an appraiser in the State of Oregon.

To reduce these barriers, the Board has amended administrative rules to:

- re-establish the "State License" credential effective January 31, 2013. The Board stopped taking applications for new State Licensed credentials in 2008. By re-establishing this credential, entry into the profession is eased because a college degree is no longer required to enter the profession.
- to allow Registered Appraiser Assistants to sign appraisal reports effective January 31, 2013. This provides some additional financial incentive to Supervising Appraisers to hire trainees because it allows the trainees to progressively assume more responsibility as competency allows.

- streamline the application process for existing licensees wishing to upgrade to a higher credential level. Previously, applicants for a State Certification were required to submit an experience log documenting *all* required experience hours to qualify for the credential being sought (2,500 hours for Certified Residential and 3,000 hours for Certified General). The streamlined process allows an applicant to upgrade their credential by submitting only the residual difference between the experience hours submitted to obtain their current credential and the required experience hours for the sought-after credential. Within the last year, the Board also worked with Federal agencies to allow the Board to recognize appraisal experience gained as an employee of a Federal agency toward certification.

The Board also continues to:

- encourage certified appraisers to become supervising appraisers through outreach and education.
- improve resources for registered appraiser assistants and supervising appraisers.
- encourage the development and delivery of appraisal education with an emphasis on appraisal as a profession through outreach to public and private education institutions.

EXHIBITS

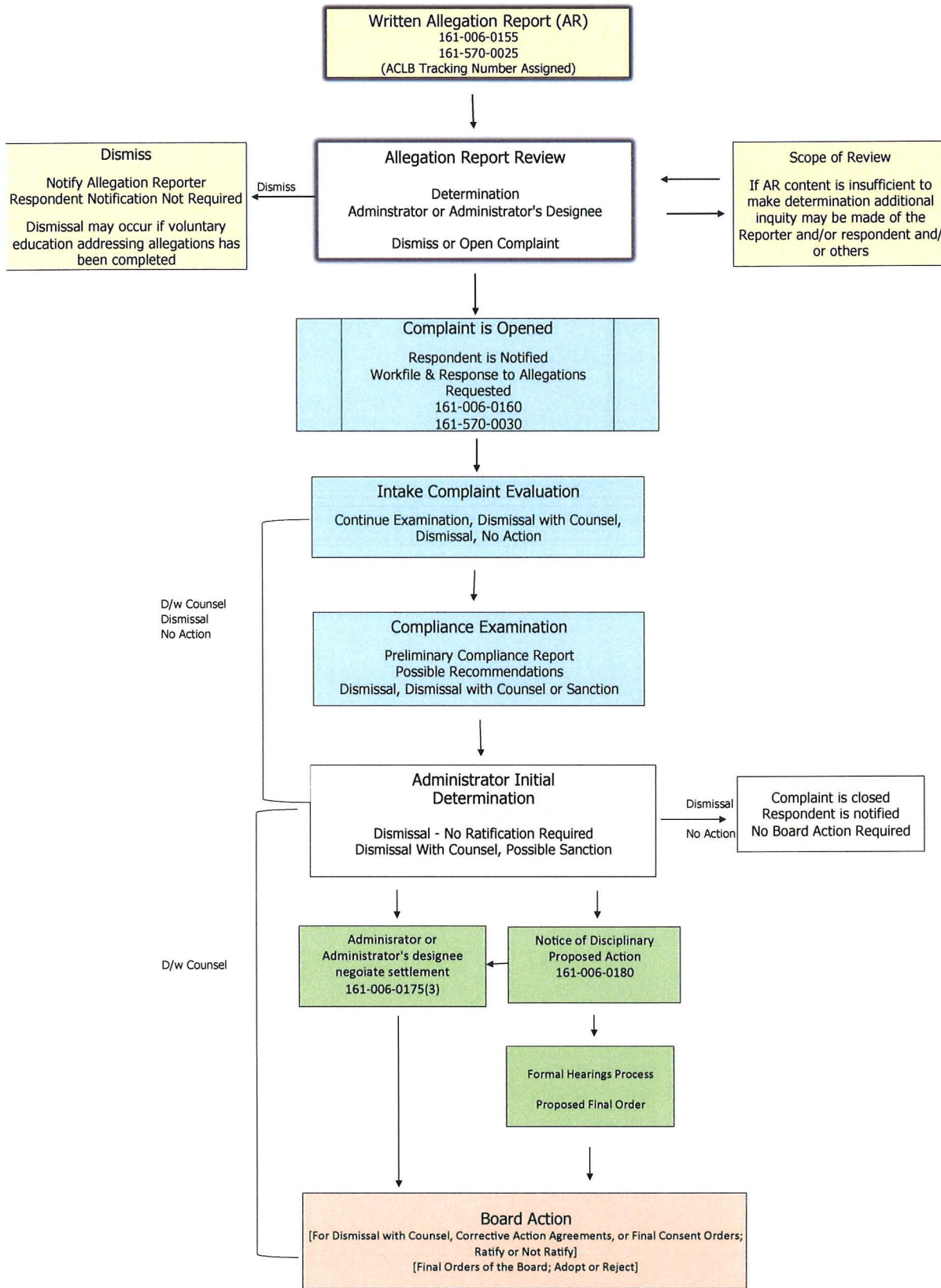
Exhibit 1 – Compliance Processing Flowchart

Exhibit 2 – Explanation of Resolution Options

Exhibit 3 – Dispute Resolution Dispositions

ACLB Compliance Process Flowchart

Date: Proposed Draft V 3.0



Appraiser Certification and Licensure Board

Explanation of Resolution Options

The Board has concluded its investigation of the complaint filed against you. The Board is satisfied by persuasive evidence that significant non-compliance with Oregon Law and/or administrative rules exists. Below are your options for resolution:

Option 1 - Formal Hearing Process:

- The Board will issue a formal Notice of Proposed Disciplinary Action. This Notice will provide detailed information regarding the allegations and cite each violation of law/administrative rule including violations of Uniform Standards of Professional Appraisal Practice. The Notice will propose the maximum disciplinary action based upon the facts of the case.
- You will have the right to appeal and your hearing rights are outlined in the Notice. If you request a hearing, your request, with a response to each allegation, must be submitted in writing within 30 days of the date of the Notice.
- A pre-hearing conference will be scheduled. This is an informal meeting with the Administrator and Board legal counsel to focus on the issues noted in the Notice. Settlement (resolution) can be reached at this point.
- If resolution is not reached at the pre-hearing conference, the Office of Administrative Hearings will schedule a date for a formal hearing which will be presided over by an Administrative Law Judge (ALJ). At this hearing, both sides will present their evidence.
- The ALJ will issue a Proposed Order based on their findings and you will be given an opportunity to present written objections to the ALJ's recommendations.
- The Board will enter a Final Order based on its consideration of all information presented to this point.
- You may appeal the Board's Final Order by filing a petition with the Oregon Court of Appeals (Judicial Review).
- You may appeal the Court of Appeals decision to the Oregon Supreme Court.

Option 2 – Settlement through a Consent Order

The Board has given the Administrator authority to negotiate settlement agreements. The Consent Order is a much briefer document – approximately 2-4 pages. The document will generally include the following information:

- Your license and status (if licensed in Oregon);
- Identification of applicable Oregon Revised Statutes (ORS) and Administrative Rules (OAR);
- Information regarding the appraisal reports (if applicable) – address, date of appraisal, etc.;
- A summary of the Board's determinations which identify specific ORS and OAR violations;
- A statement that the Board is prepared to take disciplinary action and the maximum disciplinary action applicable in your case;
- A statement that you wish to settle the matter through a stipulated agreement;
- The terms of the settlement which include: 1) the Board's findings of violations of specific ORS and OAR violations and possible admissions by you; 2) entrance of the Order which generally imposes the maximum disciplinary action; 3) specific conditions for settlement; 4) action that may be taken by the Board in case of default; 5) additional clarifying statements regarding settlement; and 6) information regarding ratification of your settlement by the Board.

Note: Oregon is a public records state. The agency will provide public records to any party that submits a request for public records. "Request for Public Records" forms are available at the agency's website www.oregonaclb.org.

Exhibit 2

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May 1, 2011 - April 30, 2013

Unless otherwise indicated, all cases were settled by mutual agreement via Final Consent Order.

Highlighted cases requested a Contested Case Hearing and settled prior to the commencement of the hearing.

DFO (Default Final Order) - Issued because the Respondent failed to respond to a Proposed Notice of Disciplinary Action within the required timeframe or did not respond

CAA (Corrective Action Agreement) – Type of resolution utilized in cases where education is deemed the best form of discipline based on violations identified

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Report to Legislative Assembly
Dispute Resolution

	Case No.	Date Filed	Date Closed	Disposition
1	10-1826	07/28/10	06/13/11	Will Not Renew - Good Faith License Return
2	11-1877	03/31/11	05/10/11	W/D Application - Will Not Reapply
3	11-1896	05/19/11	06/06/11	W/D Application - Obtain Approp Ed prior to reapplying
4	12-2015	08/09/12	11/30/12	DFO - Suspension per DOR TO BE RATIFIED
5	11-1882	04/14/11	06/17/11	DFO - Temp Non Res Application Denial
6	10-1793	03/23/10	06/13/11	Suspension / Civil Penalty / Education
7	11-1892	05/12/11	01/19/12	Suspension / Civil Penalty / Education
8	11-1893	05/12/11	01/19/12	Suspension / Civil Penalty / Education
9	11-1894	05/12/11	01/19/12	Suspension / Civil Penalty / Education
10	11-1895	05/12/11	01/19/12	Suspension / Civil Penalty / Education
11	11-1899	05/25/11	07/27/12	Surrender / Civil Penalty
12	12-2009	07/05/12	07/27/12	Surrender / Civil Penalty - See 11-1899
13	10-1824	07/19/10	09/12/11	Surrender
14	10-1851	12/01/10	08/05/11	Surrender
15	11-1872	03/07/11	06/17/11	Surrender
16	11-1898	05/24/11	07/11/11	Surrender
17	11-1921	07/12/11	06/01/12	Surrender
18	11-1933	08/31/11	10/09/12	Surrender
19	11-1939	10/03/11	11/02/11	Surrender
20	11-1863	01/03/11	09/12/11	Settlement - Good Faith License Return
21	10-1810	06/14/10	09/27/11	Settlement - Will Not Renew or Reapply for 6 yrs
22	10-1861	12/21/10	09/27/11	Settlement - Will Not Renew or Reapply for 6 yrs
23	10-1827	07/29/10	06/29/11	Settlement - Will Not Renew
24	12-1991	04/17/12	03/29/13	Settlement - Will Not Renew
25	11-1960	12/16/11	01/10/13	Settlement - Will Not Reapply
26	12-2013	07/13/12	02/14/13	Settlement - Will Not Reapply
27	11-1909	05/20/11	07/18/12	DFO - Revocation / Civil Penalty
28	12-1970	02/21/12	07/18/12	DFO - Revocation / Civil Penalty
29	11-1871	03/03/11	07/24/12	Reprimand / 5-yr Spvsg Apsr Restriction / Civil Penalty / Education
30	10-1833	09/01/10	10/20/11	Reprimand
31	12-1969	01/24/12	03/06/12	Order Terminating Notice of Prop Suspension/Renewal Denial per DOJ
32	11-1885	04/07/11	06/07/11	Order Terminating Notice of Prop Suspension per DOJ
33	11-1890	05/06/11	06/17/11	Order Terminating Notice of Prop Suspension per DOJ
34	11-1922	07/20/11	08/09/11	W/D Temp Non Resident Application - Will not Reapply
35	10-1837	10/01/10	06/07/11	Dismissed with Counsel
36	10-1841	10/08/10	06/27/11	Dismissed with Counsel
37	10-1844	10/15/10	09/13/11	Dismissed with Counsel
38	10-1853	12/08/10	07/29/11	Dismissed with Counsel
39	10-1859	12/16/10	09/14/11	Dismissed with Counsel
40	10-1860	12/21/10	09/27/11	Dismissed with Counsel
41	11-1873	03/04/11	10/20/11	Dismissed with Counsel
42	11-1879	03/23/11	11/16/11	Dismissed with Counsel
43	11-1881	04/08/11	12/20/11	Dismissed with Counsel

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	Case No.	Date Filed	Date Closed	Disposition
44	11-1884	04/18/11	01/19/12	Dismissed with Counsel
45	11-1886	04/28/11	03/21/12	Dismissed with Counsel
46	11-1888	04/29/11	09/14/11	Dismissed with Counsel
47	11-1889	05/04/11	03/13/12	Dismissed with Counsel
48	11-1897	05/19/11	02/03/12	Dismissed with Counsel
49	11-1911	06/15/11	03/14/12	Dismissed with Counsel
50	11-1923	07/25/11	05/03/12	Dismissed with Counsel
51	11-1925	07/26/11	12/15/11	Dismissed with Counsel
52	11-1931	08/08/11	04/06/12	Dismissed with Counsel
53	11-1934	09/08/11	06/07/12	Dismissed with Counsel
54	11-1945	11/08/11	09/18/12	Dismissed with Counsel
55	11-1946	11/09/11	09/04/12	Dismissed with Counsel
56	12-1964	01/23/12	12/11/12	Dismissed with Counsel
57	12-1972	01/26/12	01/11/13	Dismissed with Counsel
58	12-1973	01/26/12	01/11/13	Dismissed with Counsel
59	12-1974	01/26/12	01/11/13	Dismissed with Counsel
60	12-1976	02/16/12	01/25/13	Dismissed with Counsel
61	12-1977	02/16/12	02/05/13	Dismissed with Counsel
62	12-1982	03/13/12	02/12/13	Dismissed with Counsel
63	12-1985	03/19/12	02/14/13	Dismissed with Counsel
64	12-1995	05/10/12	03/25/13	Dismissed with Counsel
65	12-1997	06/07/12	07/11/12	DFO - Deny Supervising Apsr Endorsement
66	12-1990	05/01/12	04/02/13	Civil Penalty / Surrender Supervising Apsr Endorsement
67	10-1849	10/28/10	01/23/12	Civil Penalty / Education
68	11-1954	12/02/11	03/20/13	Civil Penalty / Education
69	11-1955	12/02/11	03/20/13	Civil Penalty / Education
70	11-1956	12/02/11	03/20/13	Civil Penalty / Education
71	11-1957	12/02/11	02/11/13	Civil Penalty / Education
72	11-1958	12/02/11	02/11/13	Civil Penalty / Education
73	11-1959	12/02/11	02/11/13	Civil Penalty / Education
74	08-1656	12/08/08	11/28/11	Civil Penalty / Education
75	10-1767	01/04/10	08/01/11	Civil Penalty / Education
76	10-1807	05/20/10	07/14/11	Civil Penalty / Education
77	10-1808	06/01/10	06/13/11	Civil Penalty / Education
78	10-1812	06/16/10	07/27/11	Civil Penalty / Education
79	10-1838	09/30/10	08/15/11	Civil Penalty / Education
80	10-1839	10/05/10	09/12/11	Civil Penalty / Education
81	10-1843	10/13/10	01/30/12	Civil Penalty / Education
82	10-1845	10/18/10	06/13/11	Civil Penalty / Education
83	11-1867	02/04/11	03/21/12	Civil Penalty / Education
84	11-1868	02/08/11	02/02/12	Civil Penalty / Education
85	11-1870	03/02/11	01/30/12	Civil Penalty / Education
86	11-1883	04/18/11	05/09/12	Civil Penalty / Education

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	Case No.	Date Filed	Date Closed	Disposition
87	11-1900	05/26/11	06/04/12	Civil Penalty / Education
88	11-1901	05/26/11	06/04/12	Civil Penalty / Education
89	11-1902	05/26/11	06/04/12	Civil Penalty / Education
90	11-1903	05/26/11	06/04/12	Civil Penalty / Education
91	11-1904	05/26/11	06/04/12	Civil Penalty / Education
92	11-1906	05/27/11	01/30/12	Civil Penalty / Education
93	11-1916	06/23/11	04/13/12	Civil Penalty / Education
94	11-1917	06/29/11	11/28/11	Civil Penalty / Education
95	11-1918	06/30/11	05/14/12	Civil Penalty / Education
96	11-1927	08/02/11	07/10/12	Civil Penalty / Education
97	11-1937	09/14/11	10/08/12	Civil Penalty / Education
98	11-1940	10/03/11	08/17/12	Civil Penalty / Education
99	11-1943	11/04/11	12/12/12	Civil Penalty / Education
100	11-1944	11/07/11	10/08/12	Civil Penalty / Education
101	11-1948	12/02/11	11/28/12	Civil Penalty / Education
102	11-1949	12/02/11	11/28/12	Civil Penalty / Education
103	11-1950	12/02/11	11/28/12	Civil Penalty / Education
104	11-1951	12/02/11	02/14/13	Civil Penalty / Education
105	11-1952	12/02/11	02/14/13	Civil Penalty / Education
106	11-1953	12/02/11	02/14/13	Civil Penalty / Education
107	12-1975	02/09/12	03/20/13	Civil Penalty / Education
108	12-1978	02/27/12	02/27/13	Civil Penalty / Education
109	12-1979	02/21/12	03/01/13	Civil Penalty / Education
110	12-1983	03/27/12	04/16/13	Civil Penalty / Education
111	12-1999	05/30/12	02/20/13	Civil Penalty / Education
112	12-2003	06/05/12	12/12/12	Civil Penalty / Education
113	12-2016	08/07/12	03/20/13	Civil Penalty / Education
114	11-1874	03/04/11	04/16/12	Civil Penalty - Unlicensed
115	11-1891	05/10/11	01/10/12	Civil Penalty - Unlicensed
116	11-1907	07/28/11	11/02/11	Civil Penalty - Unlicensed
117	11-1910	06/14/11	12/05/11	Civil Penalty - Unlicensed
118	11-1926	07/26/11	01/23/12	Civil Penalty - Unlicensed
119	12-1962	01/19/12	09/21/12	Civil Penalty - Unlicensed
120	10-1847	10/27/10	10/20/11	Civil Penalty
121	10-1852	12/07/10	09/07/11	Civil Penalty
122	10-1855	11/15/10	10/20/11	Civil Penalty
123	10-1856	12/10/10	07/29/11	Civil Penalty
124	12-1963	01/23/12	01/25/13	Civil Penalty
125	10-1822	06/20/10	06/17/11	CAA - Education
126	11-1864	01/10/11	10/26/11	CAA - Education
127	11-1880	03/24/11	07/16/12	CAA - Education
128	11-1919	06/30/11	05/08/12	CAA - Education
129	11-1947	11/17/11	12/06/12	CAA - Education