

BEFORE THE IOWA REAL ESTATE APPRAISER EXAMINING BOARD OF B. March
THE STATE OF IOWA
Signature, Executive Officer

IN THE MATTER OF:

Brad Anderson,
CR02342

RESPONDENT

Case No. 16-10

COMBINED STATEMENT
OF CHARGES AND
SETTLEMENT AGREEMENT

A. Statement of Charges

1. The Iowa Real Estate Appraiser Examining Board ("Board") has jurisdiction of this disciplinary matter pursuant to Iowa Code chapters 17A, 272C, and 543D (2015).
2. Respondent is a certified residential real estate appraiser in Iowa. He was issued Certificate No. CR02342 on April 10, 2006.
3. Certificate No. CR02342 is currently valid, and scheduled to expire on June 30, 2018.
4. In May of 2016, the Board received a complaint against Respondent raising questions about Respondent's compliance with USPAP in the development and reporting of an appraisal assignment. The Board submitted the appraisal report underlying the complaint for Standard Three USPAP review. The appraisal review revealed significant issues related to report writing, application of proper methodology, and adherence to USPAP standards of practice.
5. In light of these issues, and in order to review Respondent's work product as a whole, the Board obtained two additional appraisal reports from Respondent and submitted them for Standard Three USPAP review. Both of these appraisal reviews revealed significant issues related to report writing, application of proper methodology, and adherence to USPAP standards of practice.
6. Additionally, the appraisal reviews and additional investigation revealed Respondent had performed other farm appraisals in his capacity as a certified residential real estate appraiser, and without a certification as a certified general real property appraiser. See Iowa Admin. Code r. 193F—2.1 (creating two separate certification classifications and defining the certified residential real property appraiser as "limited to the appraisal of one to four residential units without regard to transaction value," versus the certified general real property appraiser classification as "appl[ying] to the appraisal of all types of real property").
7. The Board charges Respondent with:
 - a) Failure to adhere to USPAP in violation of Iowa Code sections 543D.17(1)(a) and .18(1) and Iowa Administrative Code rules 193F—7.2 and .3(2);
 - b) Practicing outside of the scope of a residential certification in violation of Iowa Code sections 543D.17 and Iowa Administrative Code rule 193F—7.3(5)(f).
8. The Board and Respondent have agreed to fully resolve these charges through the

following Settlement Agreement, rather than proceed to a contested case hearing.

9. Respondent admits the allegations and the charges, and agrees to comply with the Settlement Agreement to resolve disputed matters.

B. Settlement Agreement

1. Respondent has a right to a hearing on the charges. However, by freely and voluntarily entering into this Consent Order, Respondent waives Respondent's right to hearing and all attendant rights, including the right to appeal to the superintendent and seek judicial review.

2. This Settlement Agreement constitutes discipline against Respondent, and, subject to Iowa Administrative Code rule 193F—17.2(4), is the final agency action in this contested case, pursuant to Iowa Code section 17A.10 and Iowa Administrative Code rule 193—7.4.

3. Respondent acknowledges Respondent had the opportunity to consult with counsel before agreeing to this Settlement Agreement.

4. Respondent agrees the State's counsel may present this Settlement Agreement to the Board and may have ex parte communications with the Board while presenting it.

5. This Settlement Agreement shall be part of the permanent record of Respondent and shall be considered by the Board in determining the nature and severity of any future disciplinary action to be imposed in the event of any future violations.

6. This Combined Statement of Charges and Settlement Agreement is a public record available for inspection and copying in accordance with the requirements of Iowa Code chapter 22.

7. Failure to comply with the provisions of this Settlement Agreement shall be grounds for further disciplinary action pursuant to Iowa Code section 272C.3(2)(a).

8. This Settlement Agreement is subject to approval of the Board:

- a) If the Board fails to approve this Settlement Agreement, it shall be of no force or effect on either party, and it shall not be admissible for any purpose in further proceedings in this matter;
- b) If the Board approves this Settlement Agreement, it shall fully dispose of all issues in this case.

9. The Board has jurisdiction of this matter pursuant to Iowa Code chapters 17A, 272C, and 543D.

IT IS THEREFORE ORDERED that respondent shall no longer perform farm appraisals in his capacity as a certified residential real estate appraiser, unless and until he obtains certification as a certified general real property appraiser.

IT IS FURTHER ORDERED:

A. Education

1. Respondent shall successfully complete, within ninety (90) days of this Settlement Agreement being approved by the Board:

- a. A tested fifteen (15) hour national USPAP course; and
- b. A tested thirty (30) hour residential sales comparison and income approach course.

Respondent shall bear any and all costs associated with these courses and may not apply the thirty (30) hour residential sales comparison and income approach course towards his continuing education requirements for any subsequent renewal. He may apply the fifteen (15) hour USPAP course towards a subsequent renewal. Respondent may take these courses in person or online, to the extent available.

2. Respondent shall forward to the Board a certificate of completion or other similar documentation or confirmation demonstrating completion within 10 days of completion of each course required by paragraph 1.

B. Logs and Desk Review

1. For one year following the Board's approval of this Settlement Agreement, Respondent shall send the Board appraisal logs on the 10th day of each month for the prior month's appraisals. In addition to the information required by law and otherwise typically included on an appraisal log, Respondent's log shall include the acreage size and brief description of the highest and best use for each property listed thereon.

2. Submission of such logs shall serve a dual purpose:

- a. First, the Board shall use the acreage size and brief description of the highest and best use as listed on the logs to monitor whether Respondent is practicing outside of the scope of his residential certification by performing farm appraisals without being certified as a certified general real property appraiser.
- b. Second, after Respondent has completed all education required by Section A (Education), the Board shall use the logs to ensure such education has adequately addressed Respondent's USPAP compliance issues as further described below.

3. Approximately 60 days after Respondent has completed all education required by Section A (Education), the Board shall randomly select two appraisals from Respondent's log for review. Section A (Education) provides the deadline within which education must be completed. Respondent is free to escalate the time frame by completing the education earlier than the deadline.

4. The Board will retain a certified appraiser to complete Standard Three reviews on the appraisals selected for review. Respondent shall provide the Board, within 10 days of request, eight copies of the appraisals and associated work files, and the sum of \$500 to be paid

by the Board to the retained review appraiser.

5. The reviewing appraiser shall complete a comprehensive Standard Three review for each appraisal. The review shall be for facial compliance with USPAP. The reviewer will not perform inspections or warrant the accuracy of Respondent's work product, but will review work papers, calculations and any other documents reasonably needed. Along with appraisal reports and work files, Respondent shall provide the reviewing appraiser copies of all documents verifying the accuracy of factual representations in each appraisal. The reviewer may request additional information, if needed, such as documentation of paired sales analysis, documentation of support for site values, and the like. The costs associated with desk review are the responsibility of the Respondent, but are capped at the amounts noted in paragraph 4.

6. The reviewer shall prepare written comments on each appraisals' compliance with USPAP, and shall provide copies of the written comments to the Board. The Board shall provide redacted versions of the reviews to the Respondent.

7. Following the Board's receipt of the three review appraisals, the Board shall either:

- a. Enter an order indicating Respondent's full compliance with this Settlement Agreement; or
- b. If the desk review comments and appraisals reveal significant USPAP violations, the Board shall defer final ruling and may order additional education or desk reviews, or other rehabilitative measures. No such order will be issued without affording Respondent reasonable notice and an opportunity to request hearing.

8. Respondent shall not supervise an associate appraiser or otherwise co-sign another appraiser's work as a supervisor until Respondent has complied with all terms of the Settlement Agreement.

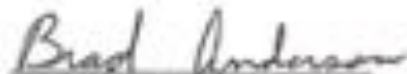
9. This Settlement Agreement shall not preclude the Board from filing additional charges if one or more of the appraisals submitted for desk review demonstrate probable cause to take such an action. Respondent agrees Board review of desk review reports or appraisals subject to desk review shall not constitute "personal investigation" or otherwise disqualify a Board member from acting as a presiding officer in any subsequent contested case(s).


Case No. 16-10

AGREED AND ACCEPTED:

Respondent

Iowa Real Estate Appraiser Examining Board


Brad Anderson

 bm
Amanda Luscombe, Chair

3-28-2017
Date

3-31-2017
Date

BEFORE THE IOWA REAL ESTATE APPRAISER EXAMINING BOARD
OF THE STATE OF IOWA

IN THE MATTER OF:

Brad Anderson,
CR02342

RESPONDENT

Case No. 16-10

NOTICE OF HEARING AND
STATEMENT OF CHARGES IN A
DISCIPLINARY CASE

The Iowa Real Estate Appraiser Examining Board ("Board") issues this Notice of Hearing and Statement of Charges pursuant to Iowa Code sections 17A.12(2), 17A.19(3), and 543D.17 (2017). Respondent is a certified residential real estate appraiser in Iowa. He was issued Certificate No. CR02342 on April 10, 2006. Certificate No. CR02342 is currently subject to a practice restriction/monitoring agreement remaining in full force and effect until further order of the Board.¹ The Board has jurisdiction of this matter pursuant to Iowa Code chapters 17A, 272C, and 543D.

A. TIME, PLACE, AND NATURE OF HEARING AND HEARING PROCEDURES

- Hearing.** A disciplinary contested case hearing will be held before the Board on the **22nd day of March, 2018, at 10:15 o'clock, a.m.,** at 200 E. Grand, Ste. 350, Des Moines, IA 50309.
- Answer.** Within 20 days of the date you are served with this Notice you must file an answer to the charges as provided in Iowa Administrative Code rule 193—7.9.
- Prehearing Conference.** A prehearing conference will be held by telephone on the **12th day of March, 2018, at 9:00 o'clock, a.m.,** before an Administrative Law Judge from the Iowa Department of Inspections and Appeals ("ALJ"). You are responsible for notifying the Board office of the telephone number at which you or your counsel may be reached. Board rules on prehearing conferences may be found at Iowa Administrative Code rule 193—7.21.
- Presiding Officer.** The full Board shall serve as presiding officer at hearing, pursuant to Iowa Code section 272C.6(1) and Iowa Administrative Code 193—7.10(1). The Board may request that an ALJ make initial rulings on prehearing matters, and be present to assist and advise the Board at hearing, as described in 193 Iowa Administrative Code 7.10(4).
- Hearing Procedures.** Board rules on hearing procedures may be found at Iowa Administrative Code chapter 193—7 and Iowa Administrative Code chapter 193—8. You have the right to respond to the charges, produce evidence on your behalf, cross-examine witnesses, and examine any documents introduced at hearing. Consult Iowa Administrative Code rule 193—7.22 if you need to request an alternative time or date. The hearing may be open to the

¹ <https://www.idph.state.ia.us/services/igi/finance/rep/DiscFile/5d-4c53c705-1e10-e711-9446-0002550823b6>

public or closed to the public at the discretion of Respondent.

6. **Default.** If you fail to appear at hearing, the Board may enter a default decision or proceed with the hearing and render a decision in your absence, in accordance with Iowa Code section 17A.12(3) and Iowa Administrative Code rule 193—7.27.

7. **Prosecution.** Licensee disciplinary cases are prosecuted by an Assistant Attorney General acting on behalf of the public interest (the State). Copies of all pleadings shall be filed with the Board, with copies mailed to:

Luke Dawson
Assistant Attorney General
Iowa Attorney General's Office
2nd Floor, Hoover State Office Building
Des Moines, Iowa, 50319.

Mr. Dawson may also be reached by phone at (515) 414-6187 or email at luke.dawson@ag.iowa.gov.

8. **Respondent's Counsel.** Copies of all pleadings filed with the Board shall be provided to: Respondent is self represented to the best of the Board's knowledge.

9. **Settlement.** The procedural rules governing the Board's settlement process are found at Iowa Administrative Code rule 193—7.42. If you are interested in pursuing settlement of this matter, please contact Assistant Attorney General Luke Dawson.

10. **Communications.** You may not contact Board members by phone, letter, facsimile, email, or in person about this Notice of Hearing and Statement of Charges. Board members may only receive information about the case when all parties have notice and an opportunity to participate, such as at the hearing or in pleadings you file with the Board office and serve upon all parties in the case. You should direct any questions to: Assistant Attorney General, Luke Dawson, or Brandy March, the Board's Executive Officer, at (515) 725-9025.

B. STATEMENT OF CHARGES AND CIRCUMSTANCES

1. The Board found probable cause to file these charges on November 30, 2017.

2. Previously, the Board and Respondent entered into a Consent Order effective March 31, 2017, as a result of significant USPAP violations and Respondent having conducted farm appraisals, which was outside of the Scope of his license as a certified residential real estate appraiser.² See Iowa Admin. Code r. 193F--2.1 (creating two separate certification classifications and defining the certified residential real property appraiser as limited to the appraisal of one to four residential units without regard to transaction value," versus the certified general real property appraiser classification as "appl[ying] to the appraisal of all types of real property").

3. The Consent Order required Respondent to:

²The prior Consent Order, as agreed to by Respondent, stated: "Respondent admits the allegations and the charges, and agrees to comply with the Settlement Agreement to resolve disputed matters."

- a) Complete certain corrective education courses;
- b) Submit logs for one (1) year following the Board's approval of the Consent Order to, in part, monitor/ensure Respondent was practicing within the Scope of Practice of a Certified Residential Appraiser;¹
- c) Sixty (60) days following the completion of the corrective education courses, submit two (2) appraisals for Standard Three desk review by a certified appraiser retained by the Board.

4. Respondent completed the required corrective education courses and, consistent with the terms of the Consent Order, the Board selected two appraisals and submitted them for Standard Three desk review by a certified appraiser retained by the Board. Those reviews continued to reveal significant USPAP violations.

5. In addition, Respondent failed to submit logs to the Board as required by the Consent Order during the months of August, September, October, November, and December of 2017.

6. Section B.7.(b) of the Consent Order provided:

If the desk review comments and appraisals reveal significant USPAP violations, the Board shall defer final ruling and may order additional education or desk reviews, or other rehabilitative measures. No such order will be issued without affording Respondent reasonable notice and an opportunity to request hearing.

7. The Consent Order also provided "This Settlement Agreement shall not preclude the Board from filing additional charges if one or more of the appraisals submitted for desk review demonstrate probable cause to take such an action."

8. As a result of Respondent's ongoing USPAP violations and failure to comply with the terms of the prior Consent Order by failing to submit appraisal logs as required, the Board exercises its authority under the prior Consent Order to "order additional education or desk reviews, or other rehabilitative measures," and additionally charges Respondent with:

- a) Failure to adhere to USPAP in violation of Iowa Code sections 543D.17(1)(a) and .18(1) and Iowa Administrative Code rules 193F—7.2, .3(2)(a) and .3(7)(a);
- b) Failure to exercise reasonable diligence in the development and communication of multiple appraisals in violation of Iowa Code section 543D.17(c) and Iowa Administrative Code rule 193F—7.3(6)(a);
- c) Demonstrating negligence or incompetence in the development, preparation and communication of multiple appraisals in violation of Iowa Code section 543D.17(f) and Iowa Administrative Code rules 193F—7.3(2)(c) and (6)(a).

¹The Consent Order specifically stated: "[T]he Board shall use the acronym and brief description of the highest and best use as listed on the logs to monitor whether Respondent is practicing outside of the scope of his residential certification by performing farm appraisals without being certified as a certified general real property appraiser."

and

- d) Failure to comply with a consent order or other decision of the board imposing discipline in violation of Iowa Code section 272C.3(2)(a) and Iowa Administrative Code rule 193F—7.3(10).

This Notice of Hearing and Statement of Charges is Filed and Issued

On the 30th day of January, 2018

B. March

Brandy March, Executive Officer
Iowa Real Estate Appraiser Examining Board
200 E. Grand, Ste. 350
Des Moines, IA 50309
Phone: (515)725-9025
brandy.march@iowa.gov

BEFORE THE IOWA REAL ESTATE APPRAISER EXAMINING BOARD

IN THE MATTER OF:

Brad Anderson,
CR02342

RESPONDENT

CASE NO. 16-10

CONSENT ORDER

The Iowa Real Estate Appraiser Examining Board ("Board") and Brad Anderson ("Respondent") enter into this Consent Order pursuant to Iowa Administrative Code rule 193—7.42:

1. The Board has jurisdiction of this matter pursuant to Iowa Code chapters 17A, 272C, and 543D.
2. Respondent is a certified residential real estate appraiser in Iowa. He was issued Certificate No. CR02342 on April 10, 2006. Certificate No. CR02342 is currently valid and subject to a Consent Order entered between the Board and Respondent effective March 31, 2017.
3. In May of 2016, the Board received a complaint against Respondent raising questions about Respondent's compliance with the Uniform Standards of Professional Appraisal Practice ("USPAP") in the development and reporting of an appraisal assignment. The Board submitted the appraisal report underlying the complaint for Standard Three USPAP review by a peer reviewer. The appraisal review revealed significant issues related to report writing, application of proper methodology, and adherence to USPAP standards of practice. In light of these issues, and in order to review Respondent's work product as a whole, the Board obtained two additional appraisal reports from Respondent and submitted them for Standard Three USPAP review by a peer reviewer. Both of these appraisal reviews revealed significant issues related to report writing, application of proper methodology, and adherence to USPAP standards of practice.
4. Additionally, the appraisal reviews and additional investigation revealed Respondent had performed farm appraisals in his capacity as a certified residential real estate appraiser, and without a certification as a certified general real property appraiser. See Iowa Admin. Code r. 193F-2.1 (creating two separate certification classifications and defining the certified residential real property appraiser as "limited to the appraisal of one to four residential units without regard to transaction value," versus the certified general real property appraiser

classification as “appl[ying] to the appraisal of all types of real property”).

5. On March 31, 2017, the Board and Respondent entered into a Consent Order to address the foregoing. The Consent Order required Respondent to: complete certain corrective education courses; submit logs for one year following the Board’s approval of the Consent Order to, in part, ensure Respondent was practicing within the scope of practice of a certified residential appraiser; and sixty (60) days following the completion of the corrective education courses, submit two (2) appraisals for Standard Three desk review by a certified appraiser retained by the Board to determine whether Respondent had adequately integrated the lessons learned from the corrective education courses into his practice and improved his report writing, methodology, and adherence to USPAP standards of practice. As part of the Consent Order, Respondent “admit[ted] the [underlying] allegations and the charges.”

6. The Consent Order also provided, in relevant part:

If the desk review comments and appraisals reveal significant USPAP violations, the Board . . . may order additional education or desk reviews, or other rehabilitative measures. No such order will be issued without affording Respondent reasonable notice and an opportunity to request hearing.

....

This Settlement Agreement shall not preclude the Board from filing additional charges if one or more of the appraisals submitted for desk review demonstrate probable cause to take such an action.

7. Respondent completed the corrective education courses and, consistent with the terms of the Consent Order, the Board selected two appraisals and submitted them for Standard Three desk review by a certified appraiser retained by the Board. Those reviews continued to reveal significant USPAP violations. Respondent also failed to submit logs to the Board as required by the Consent Order during the months of August, September, October, November and December of 2017, and January, February, and March of 2018, hampering the Board’s ability to ensure Respondent was practicing within the scope of practice of a certified residential appraiser.
8. In light of the ongoing USPAP violations and failure to comply with the terms of the prior Consent Order by failing to submit appraisal logs as required, on November 30, 2017, the Board exercised its authority under the prior Consent Order to “order additional education or desk reviews, or other rehabilitative measures,” subject to a hearing, and additionally, found probable cause to file the charges in part forming the basis of this Contested Case proceeding.

9. The Board filed a Notice of Hearing and Statement of Charges on January 30, 2018, charging Respondent with:
 - a) Failure to adhere to USPAP in violation of Iowa Code sections 543D.17(1)(a) and .18(1) and Iowa Administrative Code rules 193F—7.2, .3(2)(a) and .3(7)(a);
 - b) Failure to exercise reasonable diligence in the development and communication of multiple appraisals in violation of Iowa Code section 543D.17(e) and Iowa Administrative Code rule 193F—7.3(6)(a);
 - c) Demonstrating negligence or incompetence in the development, preparation and communication of multiple appraisals in violation of Iowa Code section 543D.17(f) and Iowa Administrative Code rules 193F—7.3(2)(c) and (6)(a); and
 - d) Failure to comply with a consent order or other decision of the board imposing discipline in violation of Iowa Code section 272C.3(2)(a) and Iowa Administrative Code rule 193F—7.3(10).
10. The Board and Respondent now wish to fully resolve the pending contested case by and through this Consent Order.
11. Respondent admits the factual allegations and violations underlying the Board's charges, and agrees to the terms of the Consent Order to resolve this matter.
12. Respondent has a right to a hearing on the charges and understands hearing is currently set for March 22, 2018, but waives Respondent's right to hearing and all attendant rights, including the right to seek judicial review, by freely and voluntarily entering into this Consent Order.
13. Respondent acknowledges he had an opportunity to consult with legal counsel prior to signing this Consent Order.
14. This Consent Order constitutes discipline against Respondent and is the final agency order in the contested case, pursuant to Iowa Code section 17A.10 and Iowa Administrative Code rule 193—7.42.
15. This Consent Order shall be part of the permanent record of Respondent and shall be considered by the Board in determining the nature and severity of any remedy or penalty to be imposed in the event of any future violations of the laws and rules administered by the Board.
16. This Consent Order is a public record available for inspection and copying in accordance with the requirements of Iowa Code chapter 22.
17. Respondent agrees the State's counsel may present this Consent Order to the Board and may have ex parte communications with the Board while presenting it.
18. This Consent Order is subject to approval of the Board:

- a. If the Board fails to approve this Consent Order, it shall be of no force or effect on either party, and it shall not be admissible for any purpose in further proceedings in this matter;
- b. If the Board approves this Consent Order, it shall fully dispose of all issues in this case.

IT IS THEREFORE ORDERED:

- A. Respondent shall **VOLUNTARILY SURRENDER** his residential real-estate appraiser Certificate No. CR02342 by and effective as of June 30, 2018. Respondent shall return his wall certificate and renewal card to the Board office within ten (10) days of the execution of this Consent Order. For the avoidance of doubt, such voluntary surrender shall constitute discipline against Respondent, and shall be treated for all intents and purposes as a **REVOCAION**.
- B. Should Respondent ever apply to reinstate his certificate at any point in the future, prior to any order granting an application for reinstatement entered by the Board, the Board shall, at a minimum, require Respondent to, as a precondition to any reinstatement and/or resuming any practice:
 - a. Take and complete the following education courses:
 - i. Tested Advanced Residential Applications and Case Studies/Part 1, 15 hours;
 - ii. Tested Advanced Residential Report Writing/Part 2, 30 hours; and
 - iii. Tested Residential Market Analysis and Highest and Best Use, 15 hours.These classes must be taken in a live, in-person format, as opposed to online; Respondent shall bear any and all costs associated with these courses; Respondent shall be barred from applying these course hours toward his continuing education for any subsequent renewal; and Respondent must forward to the Board certificates of completion or other similar documentation or confirmation demonstrating completion of these courses prior to resuming any practice.
 - b. After completing these courses, Respondent must, prior to resuming any practice, send the Board five (5) demonstration appraisals Respondent completes without significant input or assistance from any other appraiser:
 - i. The Board will retain one more certified appraisers to complete Standard Three reviews on these demonstration appraisals. Respondent shall be required to provide the Board two (2) copies of each of the demonstration appraisals and associated work files, and the costs/fees at the then-current rates applicable to

peer reviewers utilized by the Board to be paid by the Board to the retained review appraisers.

- ii. The review appraisers shall complete a comprehensive Standard Three review for each demonstration appraisal. The review shall be for facial compliance with USPAP. The reviewers shall not perform inspections or warrant the accuracy of Respondent's work product, but shall review work papers, calculations and any other documents reasonably needed. Along with appraisal reports and work files, Respondent shall provide the review appraiser copies of all documents verifying the accuracy of factual representations in each appraisal. The review appraisers may request additional information, if needed, such as documentation of paired sales analysis, documentation of support for site values, and the like. The costs associated with desk review are the responsibility of the Respondent.
 - iii. The review appraisers shall prepare written comments on each demonstration appraisals' compliance with USPAP, and shall provide copies of the written comments to the Board. The Board shall provide the reviews to the Respondent. Respondent agrees that Board review of the appraisals or Standard Three review reports shall not constitute "personal investigation" or otherwise disqualify a Board member from acting as a presiding officer in any subsequent contested case.
 - iv. Following the Board's receipt of the review appraisals, the Board shall, based on the results of the reviews, either:
 1. Enter an order indicating Respondent's license is reinstated and that Respondent may resume practice; or
 2. If the desk review comments and appraisals reveal USPAP violations, or the Board otherwise determines it is appropriate, order additional education or desk reviews, or other rehabilitative measures as a precondition to any reinstatement.
- C. Should Respondent's certificate ever be reinstated in the future, Respondent shall not supervise an associate appraiser or otherwise co-sign another appraiser's work as a supervisor.
- D. Should Respondent's certificate ever be reinstated in the future, Respondent shall be subject to the same practice restrictions imposed by the prior Consent Order entered on March 31, 2017.

Case No. 16-10

AGREED AND ACCEPTED:

Respondent

Iowa Real Estate Appraiser Examining Board

Brad Anderson

Brad Anderson

Amanda Luscombe bm

Amanda Luscombe, Chair

3-9-18

Date

3-22-18

Date