

OKLAHOMA REAL ESTATE APPRAISER BOARD

OKLAHOMA INSURANCE DEPARTMENT

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June 28, 2018

Via Certified Mail - Return Receipt Requested

Timios Appraisal Management, Inc.

Attention: Timothy Splane 4955 Steubenville Pike, Ste 305 Pittsburgh, PA 15205

RE: ORDER #18-013; Complaint # A17-012; Matter of Timios Appraisal Management, Inc.

Dear Mr. Splane

Your copy of Board Order #18-013 is enclosed. Please note on page 14 that the amount of your fines total \$1,100. Pursuant to statute, this amount is due within 30 days. If your fine is not timely received, your fine will double.

Should you have any final questions or concerns, please do not hesitate to contact this office.

Sincerely,

CHRISTINE MCENTIRE, Director

Real Estate Appraiser Board

Enclosures

STATE OF OKLAHOMA

In the Matter of TIMIOS APPRAISAL)	Complaint# A17-012
MANAGEMENT, INC.,)	
Respondent.)	

BOARD'S DECISION AS TO FINDINGS OF FACT, CONCLUSIONS OF LAW AND RECOMMENDATION OF HEARING OFFICER

ON THE 6th day of June, 2018, the above-numbered and entitled cause came on for hearing before the Oklahoma Real Estate Appraiser Board (the "Board" or "OREAB") following a disciplinary hearing that was held on April 9, 2018. The Hearing Examiner, Assistant Attorney General Kim Heaton Wilson, was duly appointed by the Oklahoma Real Estate Appraiser Board (the "Board" or "OREAB") to hear this matter. The case was prosecuted by the Board's Prosecutor, Stephen L. McCaleb. Timothy Splane appeared on behalf of Respondent, Timios Appraisal Management, Inc. (the "Respondent" or "Timios").

The Board Prosecutor, Mr. McCaleb, announced that the parties will stipulate to the allegations in the Notice of Disciplinary Proceedings, except that the State will put on proof that an employee of the OREAB contacted Respondent about the status of Respondent's registration/license. Mr. McCaleb stated that one witness would testify on behalf of OREAB regarding contact with Respondent regarding the renewal application and Respondent's registration. Mr. Splane stated that Respondent does not stipulate to the allegation in the Notice of Disciplinary Proceedings that Respondent acted with a "proceed until apprehended" motive.

Both parties presented opening statements. Mr. McCaleb presented the opening statement for OREAB, and stated that Respondent first became licensed as an appraisal

management company in March 2012. Thereafter, Respondent's license was renewed timely until 2016. Mr. McCaleb stated that in 2016, Respondent submitted the renewal application, but it was incomplete, since there was no Certificate of Authority submitted with the application by Respondent as required by OAC 600:30-1-9. Mr. McCaleb stated that an OREAB employee contacted Respondent to provide notice that they failed to submit the Certificate of Authority. Mr. McCaleb stated that Respondent continued to do business from March 31, 2016 through April 12, 2017, preparing 55 appraisals, and that Respondent's license was expired during this period of time, in violation of 59 O.S. §858-804A.

Mr. Splane stated that there were three issues involved in this proceeding. Mr. Splane stated that Timios submitted the renewal timely, but missed attaching the Secretary of State's Certificate of Good Standing to the renewal application. Mr. Splane strongly protested the allegation that Respondent acted in a malicious manner, with a "proceed until apprehended" motive. He stated that he made several efforts to contact the Ms. McEntire to discuss the lack of renewal. Mr. Splane stated that he knew the \$1,000.00 license fee for the renewal had been submitted in a timely manner, and did not knowingly operate without a license.

PRELIMINARY MATTERS

At the beginning of the hearing, the Board's Prosecutor, Mr. McCaleb initially offered seven (7) exhibits, OREAB's Exhibits 1-7 into evidence, which were admitted without objection. The following exhibits were admitted:

Grievance #A17-012 filed by the Board on May 17, 2017. Exhibit 1:

Oklahoma Appraisal Management Company Renewal Application filed by Exhibit 2:

Respondent on April 1, 2016.

Email dated April 12, 2017 from Christine McEntire advising Respondent Exhibit 3:

that it had not been registered since March 31, 2016.

Exhibit 4: Letter dated April 12, 2017 from Christine McEntire requesting immediate action concerning Respondent's expired registration.

Exhibit 5: Oklahoma Secretary of State printout dated April 12, 2017 reflecting Respondent was under suspension.

Exhibit 6: Subpoena Duces Tecum to Timios Appraisal Management, Inc. dated April 12, 2017.

Exhibit 7: Response to Subpoena Duces Tecum from Respondent filed April 25, 2017.

During the course of the hearing, OREAB offered the following additional documents into evidence, which were admitted without objection:

Exhibit 8: An Appraisal Management Company Renewal Application Form, which was issued and sent to Timios Appraisal Management, Inc. on February 3, 2016.

Exhibit 9: An email from Timothy Splane to Christine McEntire dated April 12, 2017, indicating Mr. Splane had received McEntire's email and would get a new application submitted as soon as possible

Exhibit 10: Printout from Secretary of State website, showing Timios Appraisal Management, Inc. was under suspension by the Oklahoma Tax Commission on April 12, 2017.

During the course of the hearing, Respondent offered the following documents into evidence, which were admitted without objection:

Exhibit 1: (a) Printout of a Fed Ex Tracking record, indicating that an "OK AMC Renewal" was shipped out of Pittsburgh, Pennsylvania on March 29, 2016, and was delivered and signed for by P. Kelly in Oklahoma City, Oklahoma, on Thursday, March 31, 2016 at 10:57am; and (b) Printout of FedEx record of shipment, indicating an "OK AMC Renewal" was sent by Tim Splane, Pittsburgh, Pennsylvania, to Christine McEntire, Oklahoma Real Estate Appraiser Board, on June 1, 2017, and delivered June 2, 2017.

A court reporter recorded this matter, and no party to these proceedings submitted any proposed findings of fact or proposed conclusions of law to the Hearing Examiner for its consideration.

WITNESSES AND EVIDENCE PRESENTED

The Board's Prosecutor presented one (1) witness, Eric Schoen, in support of the case against the Respondent. Upon being duly sworn, Mr. Schoen testified that he is the licensing agent at OREAB for appraisers and appraisal management companies. He stated that OREAB is housed in the Oklahoma Insurance Department. Mr. Schoen testified that OREAB issues renewal notices six (6) weeks before renewal is due, and that appraisal management companies submit renewal applications with the fee for renewal. Mr. Schoen stated that applicants must also submit their Secretary of State registration along with their renewal application and fees.

Mr. Schoen also testified about OREAB's Exhibit 8, stating that it is the Renewal Form sent out to Respondent on February 3, 2016 relating to the renewal due from Respondent by March 21, 2016. Mr. Schoen testified about OREAB's Exhibit 2, the Renewal Form, filled out by Respondent, and reflecting that Respondent timely paid the fee for the renewal. Mr. Schoen testified that the required Certificate of Authority from the Secretary of State was not included with the Renewal Form and Respondent's fee payment. Mr. Schoen also testified that the Renewal Form was received late, on April 1, 2016, but no late fee was paid. Mr. Schoen testified regarding the note he wrote on the Renewal Form received from Respondent, stating that the note indicated that Mr. Schoen tried to contact Respondent on April 4, 2016; that Mr. Schoen left a voicemail for Respondent advising that OREAB still needed the Certificate of Good Standing from the Secretary of State; that a late fee was due but was not included with the

Renewal Form; and that Respondent's status was, at that time, "inactive". Mr. Schoen testified that he received no response to his call about the status of Respondent's renewal, and made no other attempts to contact Respondent.

Mr. Schoen testified regarding OREAB Exhibit 1, OREAB's Grievance Form, filed May 17, 2017. Mr. Schoen testified that Respondent had submitted a renewal every year since it first registered in 2012. He stated that appraisal management companies renew every year.

Respondent presented one (1) witness, Timothy Splane, who testified there were three (3) things to bring to the OREAB's attention. Regarding the allegation that Respondent was operating without a license, the renewal was not issued, but the renewal application was timely submitted without the Secretary of State certification. Mr. Splane testified that the statement in the OREAB Grievance or Complaint that Timios "proceeded until apprehended" is not true, and is disputed by Respondent. Mr. Splane stated that he was in contact with Ms. McEntire, calling her repeatedly. Mr. Splane stated that he is Timios Compliance Officer, and he disputes that Timios was willfully operating outside the law without a license. Mr. Splane stated that the \$1,000.00 renewal fee was submitted in a timely manner, and payment was processed. Mr. Splane stated that Timios did not knowingly continue operating without a license, but learned in April 2017 that the renewal application had not been processed and their registration had not been renewed in April, 2016.

He stated Timios had been in business since 2011, and had never had a complaint from OREAB or any consumers. He stated that Timios is licensed in 25 states, and many states do not require licenses for appraisal management companies. Mr. Splane stated that Timios was never licensed in some states due to barriers to entry in those states, and that Timios surrendered

licenses in some states due to amount of the license fees which did not make it economically feasible for Timios given the amount of income to be made. He testified Timios is not a rogue actor, but contacted Ms. McEntire several times, who insisted that Timios go through this process. Mr. Splane stated that Timios did not recklessly violate the law, and that Mr. Splane was personally responsible for the problem with the renewal in Oklahoma, but did not hear anything from the Board, and didn't know that Timios wasn't licensed. Mr. Splane disagreed with Mr. Schoen's testimony that it's not reasonable for OREAB to send a notice to an applicant to inform them that their renewal application is incomplete, and as a result, their license is not being renewed. Mr. Splane explained that there are mitigating factors, including what Timios did right, including that they verified appraisers were currently licensed and performed automated quality control audits. Mr. Splane stated that he had never been in a hearing like this, and was hoping for reasonable settlement rather than risking the entire enterprise in Oklahoma due to Mr. Splane's mistake. He requested that OREAB please not blame Timios for his mistakes, and stated that he was willing to resign his position rather than see Timios suffer for his mistake. Mr. Splane testified that the Oklahoma Tax Commission standing was reinstated immediately upon learning that it was suspended in April, 2017, but Timios later let it expire because they determined if they were not doing business in Oklahoma, then there was no need to renew with Oklahoma Tax Commission.

A Request for Oral Argument before the Board was not filed by Respondent, Timios, and no one appeared on their behalf to address the Board.

JURISDICTION

- 1. The OREAB has the duty to carry out the provisions of the Oklahoma Appraisal Management Company Regulation Act as set forth in Title 59 of the Oklahoma Statutes, §§858-801, et seq., and to establish administrative procedures for disciplinary proceedings conducted pursuant to the provisions of the Oklahoma Appraisal Management Company Regulation Act.
- 2. The OREAB has promulgated rules and regulations to implement the provisions of the Oklahoma Appraisal Management Company Regulation Act in regard to disciplinary proceedings as set forth at the Oklahoma Administrative Code §§600:35-1-1 through 600:35-1-20, including administrative hearings.
- 3. The Oklahoma Real Estate Appraisal Board has appointed the Hearing Officer, Kim Heaton (Kim Heaton Wilson), Assistant Attorney General, as Hearing Examiner in this case pursuant to OAC 600:35-1-10.
- 4. The Respondent, TIMIOS APPRAISAL MANAGEMENT, INC., was an appraisal management company in the State of Oklahoma, holding registration number #60114AMC.

FINDINGS OF FACT

The Board hereby adopts in full the Findings of Fact of the Hearing Examiner as follows:

1. The Respondent, TIMIOS APPRAISAL MANAGEMENT, INC., was an appraisal management company previously registered in the State of Oklahoma under registration number #60114AMC, and was first licensed with the Oklahoma Real Estate Appraiser Board in March of 2012.

- 2. Timios' registration in Oklahoma as an approved appraisal management company expired March 31, 2016, after Timios submitted an incomplete renewal application to the Board for a term which would have expired on March 31, 2017.
- 3. The records admitted as evidence at the hearing in this matter reflect that a renewal application was issued by the Board on February 3, 2016, and the renewal application was mailed to the designated officer at the address of record for Respondent.
- 4. Documentation admitted into evidence shows that on March 24, 2016, the OREAB received payment from Timios for the renewal of its registration in the amount of \$1,000.00, plus a \$1.00 filing fee, and that payment for the renewal was accepted and processed on March 25, 2016.
- 5. Documentation admitted into evidence at the hearing shows that on or about March 31, 2016 or April 1, 2016, the Board received a renewal application from Timios, but the required Certificate of Good Standing from the Secretary of State was not attached, and a late fee for a renewal application received after March 31, 2016 was not included with the renewal application. As a result of the deficiencies noted upon receipt of the renewal application, the Board staff did not process the renewal.
- 6. Exhibit 2 reflects that the Oklahoma Appraisal Management Company Renewal Application submitted by Timios was file-stamped as received by OREAB on April 1, 2016.
- 7. Respondent's Exhibit 1(a), a Fed Ex Tracking record, shows that an Oklahoma AMC Renewal was delivered in Oklahoma City, and signed for by P. Kelly, on March 31, 2016 at 10:57am.

- 8. The Board's licensing officer, Eric Schoen, testified he attempted to contact the designated Timios officer, Timothy Splane, via telephone on April 4, 2016 to discuss the deficiencies relating to the renewal application. Mr. Schoen left a voice mail for Mr. Splane, advising him that a Certificate of Good Standing from the Secretary of State's Office was required for renewal, and a \$50.00 late fee was required for renewal since the renewal application that was due on or before March 31, 2016. Mr. Schoen advised Mr. Splane in the voice mail that Timios renewal application would be processed upon receipt of these two required items. Mr. Schoen testified regarding his notation on OREAB Exhibit 2, documenting the phone message he left for Mr. Splane.
- 9. Mr. Schoen testified that he received no response to the voice mail message, and no subsequent communications were exchanged between Timios to Mr. Schoen.
- 10. The evidence in the Record shows that no other communications took place between Mr. Splane or Timios and OREAB staff regarding the status of the renewal application until April 12, 2017, and no written notices were sent to Mr. Splane or other Timios representatives regarding the status of the renewal application.
- 11. The evidence in the Record shows that on April 12, 2017, the OREAB staff received an email from an appraiser inquiring about Timios' status as an appraisal management company, since Timios was not reflected on the posted roster of registered appraisal management companies. The OREAB staff responded that Timios had not been registered in Oklahoma since March 31, 2016 and should not be conducting appraisal management company services.

- 12. The evidence in the Record shows that on April 12, 2017, the Board's Director, Christine McEntire, notified the designated officer at Timios, Timothy Splane, advising that Timios needed to take steps to appropriately register its company in Oklahoma or cease any operations which might conflict with the Oklahoma Appraisal Management Company Regulation Act, based upon Timios inactive status since March 31, 2016.
- 13. The evidence in the Record shows that on April 12, 2017, the OREAB staff checked with the Secretary of State to determine Timios' status as a foreign corporation, and received information from the Secretary of State's Office reflecting that Timios' was suspended by the Oklahoma Tax Commission.
- 14. Timothy Splane testified that he did not realize that Oklahoma required reregistering each year to avoid suspension of their good standing with the Secretary of State/Tax Commission, because some states do not require re-registering. He testified that he corrected the expiration of the registration with the Secretary of State as soon as he learned from OREAB that the registration had been suspended. Mr. Splane stated that ,after he received the cease and desist conducting business letter from OREAB, Timios ceased conducting appraisal management services in Oklahoma, so he let the Secretary of State registration expire, because it was not economically feasible to continue paying for registration with the Secretary of State when their registration to provide appraisal management services in Oklahoma had not been renewed.
- 15. The evidence presented at hearing shows that pursuant to OREAB's request on April 25, 2017, Timios submitted a roster of appraisal assignments conducted during the period in which Timios was shown as inactive status as an appraisal management company.

- 16. The evidence shows that Timios operated as an appraisal management company in Oklahoma, in an unregistered capacity, between March 31, 2016 and April 12, 2017, completing 55 appraisal assignments during the period it was unregistered with the OREAB and the Oklahoma Secretary of State.
- 17. Mitigating evidence was presented, showing that Timios may not have been aware that its' renewal application had not been processed by OREAB, or that Timios was not registered to provide appraisal management company services in Oklahoma after March 31, 2016, until Mr. Splane was contacted by Board staff on April 12, 2017. No evidence was presented to show that the notice of the issues with the renewal application provided by Mr. Schoen via phone (voicemail) message, was ever received by Mr. Splane.
- 18. Mitigating evidence was presented, in the form of testimony from Mr. Splane, who stated that he believed his renewal had been processed, since his renewal fee was processed on March 25, 2016.
- 19. The testimony and evidence provided conflicts regarding whether a late fee was owed, with OREAB's evidence showing a file-stamped date of receipt of the renewal application as April 1, 2016, and Timios tracking records from Fed Ex indicating the renewal application was received on March 31, 2016. Timios renewal fee, \$1,000.00 (and a \$1.00 filing fee), was received, filed and processed by OREAB prior to March 31, 2016.
- 20. The evidence shows that Timios failed to place its registration number on an instrument that was utilized by Timios for the purpose of procuring appraisal services in Oklahoma.

- 21. Mr. Splane denied knowledge that Timios registration number was left off of an instrument that was utilized for the purpose of procuring appraisal services in Oklahoma, stating that he became aware that the registration number was left off of one of the instruments when the Board staff brought it to his attention on or after April 12, 2017.
- 22. Insufficient and/or conflicting evidence was presented to show that Timios acted in a malicious manner in continuing to conduct business after March 31, 2016.

CONCLUSIONS OF LAW

The Board hereby adopts in full the Conclusions of Law of the Hearing Examiner as follows:

- 1. Respondent violated 59 O.S. § 858-804(A), by engaging, directly or indirectly, or attempting to engage in business as an AMC, to perform or attempt to perform appraisal management services, or to advertise or hold itself out as engaging or conducting business as an appraisal management company without first obtaining a registration issued by the Oklahoma Real Estate Appraiser Board.
- 2. Respondent violated 59 O.S. § 858-823(C) by failing to place its registration number on an instrument utilized by the AMC for procurement of appraisal services in this state.
- 3. Pursuant to 59 O.S. § 858-828, the OREAB has the authority, pursuant to the Administrative Procedures Act and the Oklahoma Certified Real Estate Appraisers Act and rules promulgated thereunder, to conduct administrative proceedings, and may issue an order imposing one or more of the following penalties whenever the Board finds, by clear and

convincing evidence, that the registrant has violated any provision of the Oklahoma Appraisal Management Company Regulation Act or rules promulgated thereunder:

- a. Revocation of the registration with or without the right to reapply;
- b. Suspension of the registrant for a period not to exceed five (5) years;
- c. Stipulations, limitations, restrictions and conditions relating to conduct of the
 - registrant's appraisal management services practice;
- d. Censure, including specific redress, if appropriate;
- e. Reprimand;
- f. Administrative fines not to exceed Five Thousand (\$5,000.00) per violation;
- g. Payment of costs expended by the Board for any legal fees and costs and monitoring fees, including but not limited to administrative costs, witness fees and attorney fees.
- 4. Pursuant to 600:35-1-10, Disciplinary Proceedings, the Hearing Examiner appointed by the OREAB is authorized to conduct disciplinary proceedings and issue proposed findings of fact, conclusions of law, and disciplinary recommendations for the Board's consideration and issuance of a final order.

FINAL ORDER

WHEREFORE, having adopted in full the Findings of Fact and Conclusions of Law entered by the Hearing Examiner, the Board hereby adopts in full the recommendation of the Hearing Examiner and hereby makes its Final Order as follows:

Based upon the foregoing findings of fact and conclusions of law, the Respondent violated 59 O.S. § 858-804(A) by conducting business during a period of time in which Timios was unregistered due to submission of a deficient renewal application, and violated 59 O.S. § 858-823(C) by failing to place its registration number on an instrument utilized for procurement of appraisal services in this state. Mitigating evidence was presented during the hearing

indicating Respondent may not have received notice that the renewal application was deficient, that Timios' renewal application was not going to be processed, and that Timios registration expired March 31, 2016.

In consideration of the violations discussed herein, the mitigating evidence presented at the hearing and discussed in the findings of fact herein, and the period of time, April 12, 2017 through the present date, that Respondent ceased conducting business in the State of Oklahoma due to notice of the expiration of its registration, the Board hereby orders as follows:

- (1) The Respondent's registration as an Appraisal Management Company should be renewed upon meeting all requirements for renewal, including but not limited to registration with the Secretary of State, or, if renewal of the Respondent's expired registration is not consistent with the law relating to registration of appraisal management companies, then Respondent should be permitted to re-apply for registration as an Appraisal Management Company, and should be granted a registration upon meeting all requirements for the registration; and
- (2) The Respondent should pay a fine in the amount of \$1,000.00 for violations of 59 O.S. § 858-804(A) involving the expiration of Timios' registration on March 31, 2016, and a fine in the amount of \$100.00 for the violation of 59 O.S. § 858-823(C) relating to Timios' failure to place its registration number on an instrument utilized for procurement of appraisal services as required.

THE BOARD WISHES TO ADVISE THE RESPONDENT THAT IT HAS 30 DAYS FROM THE DATE THE RESPONDENT IS FIRST NOTIFIED OF THIS ORDER, EITHER PERSONALLY OR BY CERTIFIED U.S. MAIL, RETURN RECEIPT REQUSTED, TO APPEAL THIS ORDER WITH THE APPROPRIATE DISTRICT COURT.

IT IS SO ORDERED on this 6th day of June, 2018

Enix	M.	Schol
ERIC SCHO	EN. Adr	ninistrative Officer

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6-14-2018

Real Estate Appraiser Board

Date

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Date

Assistant Attorney General and Attorney for the Board

CERTIFICATE OF SERVICE

This is to certify that on this 28th day of June, 2018, a true and correct copy of the foregoing document was mailed Certified Mail, Return Receipt Requested, postage prepaid, to:

Timios Appraisal Management, Inc. **Attention: Timothy Splane** 4955 Steubenville Pike, Ste. 305 Pittsburgh, PA 15205

9214 8902 0982 7500 0102 12

And by regular first class mail to:

Stephen L. McCaleb DERRYBERRY & NAIFEH 4800 N. Lincoln Boulevard Oklahoma City, OK 73105

Bryan Neal, Assistant Attorney GeneralOFFICE OF THE ATTORNEY GENERAL
313 N.E. 21st Street
Oklahoma City, OK 73105

Kimberly Heaton Wilson, Assistant Attorney General and Hearing Examiner OFFICE OF THE ATTORNEY GENERAL 313 N.E. 21st Street Oklahoma City, OK 73105

KATLA DEKA



Office of Attorney General State of Oklahoma

CKLAHOMAINSURANCE DEPT. JUN 2 7 2018

Real Estate Appraiser Board

ATTORNEY GENERAL OPINION 2018-237A

Christine McEntire, Director Oklahoma Real Estate Appraiser Board 3625 NW 56th St., Ste. 100 Oklahoma City, OK 73112 June 27, 2018

Dear Director McEntire:

This office has received your request for a written Attorney General Opinion regarding agency action that the Oklahoma Real Estate Appraiser Board intends to take (i) with respect to inactive licensee 60114AMC in complaint A17-012, and (ii) pursuant to consent agreement with respect to inactive licensee 60021AMC in complaint A17-013. Both inactive licensees operated in Oklahoma as appraisal management companies (AMC) without properly renewing their credentials. Inactive licensee 60114AMC also failed to place its registration number on an instrument utilized for the procurement of appraisal services. The Board proposes to impose a \$1,100 fine on inactive licensee 60114AMC and a \$7,000 fine on inactive licensee 60021AMC.

The Oklahoma Appraisal Management Company Regulation Act authorizes the Board to impose administrative fines when "a registrant has violated any provision of the [Act]." 59 O.S.Supp.2017, § 858-828(A)(6). The Act provides that "[i]t is unlawful for a person to...engage...in business as an AMC...without first obtaining a registration issued by the [Board] under the provisions of the [Act]." *Id.* § 858-804(A). The Act also requires an AMC "to place its registration number on any instrument utilized...for [the] procurement of appraisal services in [Oklahoma]." 59 O.S.2011, §858-823(C). The Board may reasonably believe that the proposed actions are necessary to prevent future violations.

It is, therefore, the official opinion of the Attorney General that the Oklahoma Real Estate Appraiser Board has adequate support for the conclusion that this action advances the State's policy to provide a process for the registration and regulation of entities engaging in real estate appraisal management services with the State of Oklahoma.

MIKE HUNTER

ATTORNEY GENERAL OF OKLAHOMA

RYAN CHAFFIN

DEPUTY CHIEF - ASSISTANT ATTORNEY GENERAL