

**FILED**  
JUL 11 2025

**BEFORE THE REAL ESTATE APPRAISER BOARD** Real Estate Appraiser Board  
**STATE OF OKLAHOMA** State of Oklahoma

In the Matter of AUBREY DOBBS )  
Respondent. ) Complaint # 24-015, and 25-004

**CONSENT ORDER**

COMES NOW the Oklahoma Real Estate Appraiser Board ("OREAB"), by and through the Prosecuting Attorney, D. Ty Mowdy, and the Respondent, Aubrey Dobbs, represented by Justin King, and enter this Consent Order, pursuant to Oklahoma Statutes, Title 59, Sections 858-700, *et seq.*, and Oklahoma Administrative Code 600:10-1-1, *et seq.* All sections of this order are incorporated herein.

**AGREED FINDINGS OF FACT FOR COMPLAINT # 24-015**

1. The Respondent was hired to complete an appraisal (the "appraisal") for a property located at 3419 Abby Ln, Newcastle, Oklahoma 73065 (hereinafter the "Abby Ln, Property").
2. On or around June 13, 2024, Respondent signed an appraisal report which is the subject of the Complaint # 24-015.
3. The effective date of the appraisal report is June 7, 2024.
4. Respondent committed a series of errors in the report which led to a misleading and non-credible report.
5. The Respondent identified in the report an accessory unit for the Abby Ln. Property. Although the accessory unit was identified, the Respondent failed to discuss it or give it value.
6. The Comparable Number 2 utilized in the report, has a 40 foot by 40 foot shop that the Respondent did not identify on the comparable grid.

7. The quality and quantity of data available and analyzed within the approaches used were not adequately reconciled.
8. The applicability and suitability of the approaches used to arrive at the value conclusion was not adequately reconciled.
9. The appraisal report does not contain sufficient information to enable the client(s) and intended user(s) who receive or rely on the report to understand it properly.

**AGREED FINDINGS OF FACT FOR COMPLAINT # 25-004**

10. The Respondent was hired to complete an appraisal (the "appraisal") for a property located at 912 NW 8<sup>th</sup> St., Oklahoma City, Oklahoma 73106 (hereinafter "8<sup>th</sup> St. Property")
11. On September 28, 2024, Respondent signed an appraisal report which is the subject of Complaint # 25-004.
12. The effective date of the appraisal report is September 26, 2024.
13. The Respondent committed a series of errors in the report which led to a misleading report.
14. The Respondent failed to include sufficient data, information, and documentation necessary to support the Respondent's opinions and conclusions and to show compliance with USPAP, or references to the location of such other data, information and documentation.
15. The Respondent's report lacked competency in that there are conflicting statements in the report as well as comments that do not appear to apply to the assignment at hand.
16. The Respondent's work was insufficient to develop credible assignment results.
17. The Respondent did not correctly complete the research and analyses necessary to produce a credible appraisal.

18. The Respondent did not correctly employ recognized methods and techniques that are necessary to produce a credible appraisal, and the appraisal was completed in a careless or negligent manner, by making a series of errors that, although individually might not significantly affect the results of an appraisal, in the aggregate affects the credibility of those results.
19. The Respondent relied on pre-printed Scope of Work in the URAR form, but did not extend Scope of Work to account for an appraisal completed on a property where there were limited sales.
20. The Respondent did not identify and analyze the effect on use and value of existing land use regulations, reasonable probable modifications of such land use regulations, economic supply demand, the physical adaptability of the real estate and the market trends. The highest and best use of the subject real estate was not sufficiently analyzed.
21. The Respondent did not verify and analyze all information pertaining to the comparable sales versus the subject, and the appraiser provided no data as to the source of the cost approach and provided questionable sources for comparable sales data, i.e. Market Data Research.
22. The Respondent did not clearly communicate each analysis, opinion and conclusion.
23. There was insufficient information presented to enable the intended user(s) of the appraisal to understand the report properly.
24. There were conflicting statements regarding which reporting option was utilized by the Respondent.

#### **CONCLUSIONS OF LAW**

25. The Board has jurisdiction over this matter and Respondent, pursuant to the Oklahoma Certified Real Estate Appraisers Act, 59 O.S. § 858-723.
26. Any Finding of Fact, which is properly a Conclusion of Law, is incorporated herein by reference and vice versa.
27. The Respondent has violated 59 O.S. § 858-723(C)(6) regarding the development and communication of the real estate appraisals.

28. The Respondent has violated 59 O.S. § 858-723(C)(7) for failure to exercise reasonable diligence in developing the appraisals.
29. The Respondent has violated 59 O.S. § 858-723(C)(8) for negligence and incompetence in developing appraisals and preparing the appraisal reports.
30. The Respondent has violated 59 O.S. § 858-723(C)(13) for a failure to exercise reasonable diligence in developing the appraisals.
31. The Respondent has violated 59 O.S. § 858-726 for a failure to comply with the Uniform Standards of Professional Appraisal Practice. More Specifically:
  - A. The Records Keeping Rule of the Uniform Standards of Professional Appraisals Practice;
  - B. The Scope of Work Rule of the Uniform Standards of Professional Appraisals Practice;
  - C. The Competency Rule of Uniform Standards of Professional Appraisals Practice; and
  - D. Standard Rules 1, 1-1, 1-2, 1-3, 1-4, 1-5, 2, 2-1, and 2-2 of the Uniform Standards of Professional Appraisals Practice. These include subsections of the referenced rules.

#### CONSENT AGREEMENT

The Respondent, by affixing his signature hereto, acknowledges:

32. The Respondent has been advised to seek advice of counsel prior to signing this document.
33. The Respondent possesses the following rights among others:
  - A. The right to a formal fact finding hearing before a disciplinary panel of the Board;
  - B. The right to a reasonable notice of said hearing;
  - C. The right to be represented by counsel;
  - D. The right to compel the testimony of witnesses;
  - E. The right to cross-examine witnesses against him; and
  - F. The right to obtain judicial review of the final decision of the Board.
34. The Respondent stipulates the facts set forth above and specifically waives his rights to contest these findings in any subsequent proceeding before the Board and his rights to appeal this matter to District Court.

35. The Respondent acknowledges that the entry of this Order could affect his professional practice of real estate appraising in Oklahoma.
36. The Respondent agrees and consents that this Consent Order shall not be used by him for purposes of defending any other action initiated by the Board, regardless of the date of the Appraisal.
37. Respondent acknowledges that this Agreement will be placed on the Board's Agenda for its next monthly meeting, after receipt of the executed Order from the Respondent, and notice for the Order's placement on that Agenda is accepted.
38. This Consent Order may be executed in one or more counterparts, but all such counterparts, taken together, shall constitute only one Consent order. When delivered to the other parties, facsimile and visual digital reproduction of original signatures shall be as effective as if they were the originals.
39. This Consent Order shall be governed by the internal laws of the State of Oklahoma without regard to the conflict of law principles.
40. This Consent Order contains the entire agreement between the parties hereto, and all provisions of this Consent Order are Contractual and not a mere recital. The parties acknowledge that no presentation or promise not expressly set forth in this Consent Order has been made by any of the parties hereto or any of their agents, employees, representatives or attorneys. No modification of, or amendment to this Consent order shall be valid unless it is in writing and signed by the parties hereto. In the event any portion of this Consent Order shall be declared invalid or unenforceable as a matter of law, the remainder of the Consent Order shall remain in full force and effect.
41. This Consent Order is intended by the parties to be an integrated writing representing the complete, final and exclusive embodiment of their agreement. It supersedes all prior or contemporaneous agreements, understandings, discussions, negotiations and commitments, written or oral. This Consent Order may not be altered, amended, modified, supplemented, or otherwise changed, except by a writing executed by an authored representative of each of the parties.
42. The undersigned Respondent agrees that presentation of this Consent Order to the Board without the undersigned Respondent being present shall not constitute an improper *ex parte* communication between the Board and its attorney.

43. The Parties represent and warrant to one another that each party has authority to enter into this binding Consent Order. The Board represents and warrants the undersigned have full authority to execute this Consent Order on behalf of the Board and bind the Board to the terms set forth herein.

44. The parties acknowledge they understand the provisions of this Consent Order.

### **ORDER**

WHEREFORE, based on the foregoing Agreed Findings of Fact and Agreed Conclusions of Law, it is ordered that:

45. The Respondent will successfully complete and provide proof of the completion to the Board's office of the following Corrective Education Courses offered by The Appraisal Foundation within six (6) months from the date the Consent Order is finalized. The courses to be taken are:

*A. Report Certifications: What Am I Signing and Why?*

*B. Scope of Work: Appraisals and Inspections*

*C. Ethics, Competency, and Negligence*

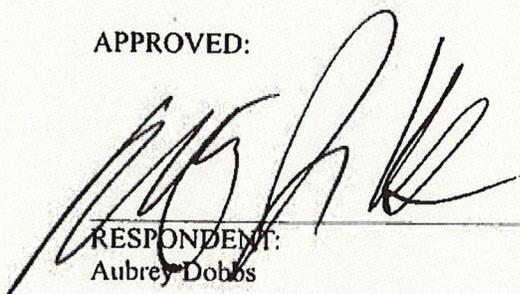
46. An administrative fine in the amount of One Thousand Dollars (\$1,000.00) is to be paid by the Respondent in accordance with 59 O.S. § 858-723(B)(2). This fine shall be paid within thirty (30) days of the Consent Order being signed by the Board.

47. Failure to comply with the preceding paragraphs in a timely manner will result in an instant suspension of the Respondent's license. For good cause, an extension may be granted by the Board. An application for an Extension of Time should be filed at least five (5) business days in advance of the Board meeting so it can be placed on the meeting agenda in advance of the deadline to comply with this Consent Order.

**DISCLOSURE**

Pursuant to the Oklahoma Open Records Act, Title 51 Oklahoma Statutes, Sections 245-A.1 through 24-A.21, the signed original of this Consent Order shall remain in the custody of the Board as a public record and shall be made available for public inspection and copying upon request.

APPROVED:



RESPONDENT:  
Aubrey Dobbs

7/9/25  
DATE:

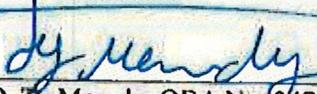


JUSTIN T. KING, OBA # 18745  
KING LAW FIRM  
24 N.E. 53rd Street  
Oklahoma City, Oklahoma 73105  
(405) 239-6143; (405) 378-4018 - fax  
[jtk@king-lawfirm.com](mailto:jtk@king-lawfirm.com)  
Counsel for the Respondent, Aubrey Dobbs

DATE:

**CERTIFICATION OF BOARD PROSECUTING ATTORNEY**

I believe this Consent Order to be in the best interest of the Oklahoma Real Estate Appraiser Board and the State of Oklahoma regarding the violations outlined in the foregoing Consent Order.

  
D. Ty Mowdy, OBA No. 34733  
Assistant Attorney General  
Oklahoma Office of the Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105  
Email: ty.mowdy@oag.ok.gov  
*Counsel for the Oklahoma Real Estate Appraiser Board*

7/9/25  
DATE:

IT IS SO ORDERED on this 11<sup>th</sup> day of July, 2025



  
Jenelle LePoint, Board Secretary  
Oklahoma Real Estate Appraiser Board

  
Bryan Neal, OBA No. 6590  
Assistant Attorney General  
Oklahoma Office of the Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, Oklahoma 73105

**CERTIFICATE OF MAILING**

I, Kelly Ann Reynolds, hereby certify that on the 11<sup>th</sup> day of July 2025, a true and correct copy of the above and foregoing Consent Order was placed in the U.S. Mail, with postage pre-paid by Certified Mail to:

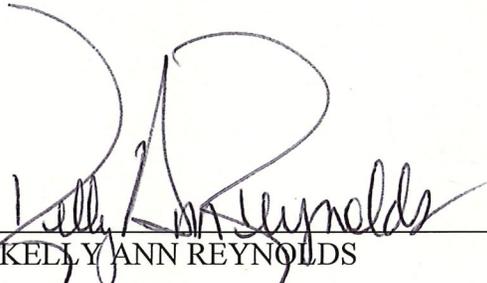
**Justin T. King, Esq.**  
KING LAW FIRM  
24 NE 53<sup>rd</sup> St  
Oklahoma City, OK 73105

9214 8902 0982 7500 0731 32

by First Class Mail to:

**Bryan Neal, Assistant Attorney General**  
OFFICE OF THE ATTORNEY GENERAL  
313 NE 21<sup>st</sup> St  
Oklahoma City, OK 73105

**D. Ty Mowdy, Esq.**  
OFFICE OF THE ATTORNEY GENERAL  
313 NE 21<sup>st</sup> St  
Oklahoma City, OK 73105

  
KELLY ANN REYNOLDS