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8 **BEFORE THE**
9 **BUREAU OF REAL ESTATE APPRAISERS**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. L20250920-01

13 **CONSOLIDATED ANALYTICS, INC.,**
14 **JEFFREY T. RAULAND**
15 **1 MacArthur Place, Ste 100**
16 **Santa Ana, CA 92707**

ACCUSATION

17 **Company Certificate of Registration No.**
18 **1386**

19 Respondent.

20 **PARTIES**

21 1. Tinna Morlatt ("Complainant"), acting on behalf of the Bureau of Real Estate
22 Appraisers (formerly Office of Real Estate Appraisers, referred to herein as the "Bureau" or
23 "BREA"), Department of Consumer Affairs, brings this Accusation solely in her official capacity
24 as Deputy Bureau Chief of Enforcement.

25 2. On or about May 20, 2010, the Bureau issued Company Certificate of Registration
26 Number 1386 to Consolidated Analytics, Inc., ("Respondent"). As of the date of this pleading,
27 Brian G. Gehl, Aravinthan A. Wijay, Jeffrey T. Rauland, and Dana S. Gross are the Controlling
28 Persons of Respondent; and Jeffrey T. Rauland is Respondent's Designated Officer. At the time
of the allegations alleged herein, Richard S. Galpin, Brian G. Gehl, Aravinthan A. Wijay, Joseph
C. Andrea, and Dana S. Gross were the Controlling Persons of Respondent; and Aravinthan A.

1 Wijay was the Designated Officer. The Company Certificate of Registration was in full force and
2 effect at all times relevant to the charges brought herein and will expire on January 1, 2027,
3 unless renewed.

4 **JURISDICTION**

5 3. This Accusation is brought before the Bureau for the Department of Consumer
6 Affairs, under the authority of the following laws. All section references are to the Business and
7 Professions Code ("Code") unless otherwise indicated.

8 4. Business and Professions Code section 11301 states:

9 (a) There is hereby created within the Department of Consumer Affairs a
10 Bureau of Real Estate Appraisers to administer and enforce this part.

11

12 5. Business and Professions Code section 11313 states:

13 The bureau is under the supervision and control of the Director of Consumer
14 Affairs. The duty of enforcing and administering this part is vested in the chief, and
15 the chief is responsible to the Director of Consumer Affairs therefor. The chief shall
16 adopt and enforce rules and regulations as are determined reasonably necessary to
17 carry out the purposes of this part. Those rules and regulations shall be adopted
18 pursuant to Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of
19 Title 2 of the Government Code. Regulations adopted by the former Director of the
20 Bureau of Real Estate Appraisers shall continue to apply to the bureau and its
21 licensees.

22 6. Business and Professions Code section 11314 states:

23 The bureau is required to include in its regulations requirements for licensure
24 and discipline of real estate appraisers that ensure protection of the public interest and
25 comply in all respects with Title XI of the Financial Institutions Reform, Recovery
26 and Enforcement Act of 1989, Public Law 101-73 and any subsequent amendments
27 thereto. Requirements for each level of licensure shall, at a minimum, meet the
28 criteria established by the Appraiser Qualification Board of the Appraisal Foundation.
The bureau may additionally include in its regulations requirements for the
registration of appraisal management companies consistent with this part.

7. Business and Professions Code section 11315.3 states:

The suspension, expiration, or forfeiture by operation of law of a license or
certificate of registration issued by the office, or its suspension, forfeiture, or
cancellation by order of the office or by order of a court of law, or its surrender
without the written consent of the office, shall not, during any period in which it may
be renewed, restored, reissued, or reinstated, deprive the office of its authority to
institute or continue a disciplinary proceeding against the licensee or registrant upon
any ground provided by law or to enter an order suspending or revoking the license or
certificate of registration, or otherwise taking disciplinary action against the licensee
or registrant on any such ground.

STATUTORY PROVISIONS

8. Business and Professions Code section 11302 states:

For the purpose of applying this part, the following terms, unless otherwise expressly indicated, shall mean and have the following definitions:

....

(b) "Appraisal" means the act or process of developing an opinion of value for real property.

....

(d) (1) "Appraisal management company" means any person or entity that satisfies all of the following conditions:

(A) Provides appraisal management services to creditors or to secondary mortgage market participants, including affiliates.

(B) Provides those services in connection with valuing a consumer's principal dwelling as security for a consumer credit transaction or incorporating those transactions into securitizations.

(C) Within a given 12 calendar month period oversees an appraiser panel of more than 15 state-certified or state-licensed appraisers in a state or 25 or more state-certified or state-licensed appraisers in two or more states, as described in Section 11345.5.

(2) An appraisal management company does not include a department or division of an entity that provides appraisal management services only to that entity.

(3) An appraisal management company that is a subsidiary of an insured depository institution and regulated by a federal financial institution is not required to register with the bureau.

(e) "Appraisal management services" means one or more of the following:

(1) Recruiting, selecting, and retaining appraisers.

(2) Contracting with state-certified or state-licensed appraisers to perform appraisal assignments.

(3) Managing the process of having an appraisal performed, including providing administrative services such as receiving appraisal orders and appraisal reports, submitting completed appraisal reports to creditors and secondary market participants, collecting fees from creditors and secondary market participants for services provided, and paying appraisers for services performed.

(4) Reviewing and verifying the work of appraisers.

....

(h) "Bureau" means the Bureau of Real Estate Appraisers.

.....
(j) "Controlling person" means one or more of the following:

(1) An officer or director of an appraisal management company, or an individual who holds a 10 percent or greater ownership interest in an appraisal management company.

(2) An individual employed, appointed, or authorized by an appraisal management company that has the authority to enter into a contractual relationship with clients for the performance of appraisal services and that has the authority to enter into agreements with independent appraisers for the completion of appraisals.

(3) An individual who possesses the power to direct or cause the direction of the management or policies of an appraisal management company.

.....

(n) "Department" means the Department of Consumer Affairs.

(o) "Director" or "chief" means the Chief of the Bureau of Real Estate Appraisers.

.....

(u) "License" means any license, certificate, permit, registration, or other means issued by the bureau authorizing the person to whom it is issued to act pursuant to this part within this state.

.....

(w) "Registration" means the procedures and requirements with which a person or entity shall comply in order to qualify to conduct business as an appraisal management company.

.....

9. Business and Professions Code section 11319 states:

(a) Notwithstanding any other provision of this code, except as provided in subdivision (b), the Uniform Standards of Professional Appraisal Practice constitute the minimum standard of conduct and performance for a licensee in any work or service performed that is addressed by those standards. If a licensee also is certified by the Board of Equalization, he or she shall follow the standards established by the Board of Equalization when fulfilling his or her responsibilities for assessment purposes.

.....

10. Business and Professions Code section 11325, subdivision (a) states:

The director shall adopt regulations which determine the parameters of appraisal work which may be performed by licensed appraisers.

1 11. Business and Professions Code section 11345.4 states:

2 No person or entity acting in the capacity of an appraisal management company
3 shall improperly influence or attempt to improperly influence the development,
4 reporting, result, or review of any appraisal through coercion, extortion, inducement,
5 collusion, bribery, intimidation, compensation, or instruction. Prohibited acts include,
6 but are not limited to, the following:

7 (a) Seeking to influence an appraiser to report a minimum or maximum value
8 for the property being valued. Such influence may include, but is not limited to, the
9 following:

10

11 (4) Providing an appraiser with an anticipated, estimated, encouraged, or
12 desired valuation prior to their completion of an appraisal.

13

14 **REGULATORY PROVISIONS**

15 12. Title 10, California Code of Regulations, section 3500 states:

16 (a) Words shall have their usual meaning unless the context or a definition
17 clearly indicates a different meaning. Words used in their present tense include the
18 future tense and words in the singular form include the plural form. Use of the word
19 "shall" or "must" denotes mandatory conduct; "may" denotes permissive conduct;
20 and "should" denotes recommended conduct.

21 (b) As used in these regulations, the following words and phrases shall have the
22 following definitions:

23

24 (2) "Appraisal management company" means any person or entity as defined in
25 Business and Professions Code section 11302.

26 (3) "Appraisal management services" as defined in Business and Professions
27 Code section 11302.

28

(6) "Appraiser" means an individual who holds a license issued by the Bureau
of Real Estate Appraisers;

. . . .

(10) "BREA" means the California Bureau of Real Estate Appraisers;

(11) "Bureau" means the California Bureau of Real Estate Appraisers;

(12) "Certificate of Registration" means a certificate issued by the California
Bureau of Real Estate Appraisers verifying the registration of a person or entity as
approved to conduct business in California as an Appraisal Management Company.

1 (13) "Chief" means the Chief of BREa or their designee;

2 (14) "Controlling Person" means one or more of the following:

3 (A) An officer or director of an Appraisal Management Company, or an
4 individual that holds 10% or greater ownership interest in an Appraisal
5 Management Company.

6 (B) An individual employed, appointed or authorized by an Appraisal
7 Management Company that has the authority to enter into a contractual
8 relationship with clients for the performance of appraisal services and that has
9 the authority to enter into agreements with independent appraisers for the
10 completion of appraisals.

11 (C) An individual who possesses the power to direct or cause the
12 direction of the management or policies of an Appraisal Management
13 Company.

14

15 (16) "Designated Officer" means a Controlling Person authorized by the
16 governing structure of the Appraisal Management Company to act on behalf of the
17 company for purposes of application for, and compliance with, a Certificate of
18 Registration to operate as an Appraisal Management Company pursuant to California
19 law. The Designated Officer shall be responsible for the supervision and control of
20 activities conducted on behalf of the Appraisal Management Company by its officers
21 and employees as necessary to secure full compliance with the Real Estate
22 Appraisers' Licensing and Certification Law and these regulations as related to
23 Appraisal Management Companies.

24

25 (20) "Registrant" means a person or entity authorized to conduct business as an
26 Appraisal Management Company in California through issuance of a Certificate of
27 Registration by the California Bureau of Real Estate Appraisers.

28 (21) "Registration" means the procedures and requirements with which a
person or entity shall comply in order to qualify to conduct business as an Appraisal
Management Company;

. . . .

(24) "Uniform Standards of Professional Appraisal Practice; (USPAP)" means
those standards as adopted by the Appraisal Standards Board of the Appraisal
Foundation.

13. Title 10, California Code of Regulations, section 3577, states:

All Appraisal Management Companies must ensure that they adhere to the
following business practices when performing appraisal management services for
properties located within the State of California:

. . . .

(e) No Appraisal Management Company shall improperly influence or attempt
to improperly influence the development, reporting, result, or review of an appraisal

1 report or review by engaging in coercion, extortion, inducement, collusion, bribery,
2 intimidation, compensation, or instruction. In addition to the acts set forth in Business
and Professions Code section 11345.4, prohibited acts include, but are not limited to,
the following:

3

4 (4) Providing an appraiser with an anticipated, estimated, encouraged, or
5 desired valuation before or after the completion of the appraisal report;

6

7 14. California Code of Regulations, title 10, section 3721 states:

8 (a) The Chief may issue a citation, order of abatement, assess a fine or private
or public reproof, suspend or revoke any license or Certificate of Registration, and/or
9 may deny the issuance or renewal of a license or Certificate of Registration of any
person or entity acting in a capacity requiring a license or Certificate of Registration
10 who has:

11

12 (7) Violated any provision of the Real Estate Appraisers' Licensing and
Certification Law, Part 3 (commencing with Section 11300) of Division 4 of the
13 Business and Professions Code, or regulations promulgated pursuant thereto; or any
provision of the Business and Professions Code applicable to applicants for or holders
14 of licenses or Certificate of Registration;

15

16 (b) Before issuing any private or public reproof or denying, suspending, or
revoking any license or Certificate of Registration issued or issuable under the
17 provisions of the Real Estate Appraisers Licensing and Certification Law or these
regulations, the Bureau shall proceed as prescribed by Chapter 5 (commencing with
18 Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code (the
Administrative Procedure Act) and the Bureau shall have all the powers granted
19 therein.

20 (c) Any person or entity issued a citation containing a fine or order of
abatement may contest the citation by filing a written notice with the Bureau within
21 30 calendar days that states with specificity the basis of the appeal. Upon receipt of
such notice, the Bureau shall proceed as prescribed by Chapter 5 (commencing with
22 Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code (the
Administrative Procedure Act) and the Bureau shall have all the powers granted
23 therein.

24 **FINE PROVISIONS**

25 15. Business and Professions Code section 11316, subdivision (a) states:

26 (a) The director may assess a fine against a licensee, applicant for licensure,
person who acts in a capacity that requires a license under this part, course provider,
27 applicant for course provider accreditation, or a person who, or entity that, acts in a
capacity that requires course provider accreditation for violation of this part or any
28 regulations adopted to carry out its purposes.

1 16. California Code of Regulations, title 10, section 3724 states:

2 (a) Where the Chief has verified a notice of acts or omissions by a licensed
3 appraiser, Registrant or person or entity acting in a capacity requiring a license or
4 Certificate of Registration which constitute a violation of statute, regulation or
5 USPAP, he/she may issue a citation in writing which describes with particularity the
6 nature of the violation and including specific reference to the law, regulation or
professional practice standard determined to have been violated. The citation may
include a notice of abatement fixing a reasonable period of time for abatement of the
violation, assessment of private or public reproof, suspension, revocation, restriction
of license, fine or any combination of these actions.

7 (b) Fines shall not exceed \$10,000 per incident. In assessing a fine, the Chief
8 shall give due consideration to:

9 (1) The gravity of the violation;

10 (2) The good or bad faith of the person cited;

11 (3) The history of previous violations;

12 (4) Evidence that the violation was willful;

13 (5) The extent to which the cited person has cooperated with the Bureau;

14 (6) The extent to which the cited person has mitigated or attempted to
mitigate any loss or potential loss caused by the violation; and

15 (7) Such other matters as the Chief determines are in the interest of
16 justice.

17

18 COST RECOVERY

19 17. Business and Professions Code section 11409, subdivision (a) states:

20 Except as otherwise provided by law, any order issued in resolution of a
21 disciplinary proceeding may direct a licensee, applicant for licensure, person who acts
22 in a capacity that requires a license under this part, registrant, applicant for a
23 certificate of registration, course provider, applicant for course provider accreditation,
or a person who, or entity that, acts in a capacity that requires course provider
accreditation found to have committed a violation or violations of statutes or
regulations relating to real estate appraiser practice to pay a sum not to exceed the
reasonable costs of investigation, enforcement, and prosecution of the case.

24 ///

25 ///

FACTUAL ALLEGATIONS

18. On or about August 22, 2024, a licensed real estate appraiser, B. F.,¹ filed a complaint with the Bureau alleging Respondent emailed B. F. an invitation to submit a bid for a new appraisal assignment. B. F. alleged that respondent included an estimated value of the subject property in the solicitation email he received. The Bureau initiated an investigation into the complaint.

19. On August 21, 2024, a Respondent's employee with the title "Senior Analyst—Appraisal Coordination" sent an email to B. F. inviting B. F. to submit a bid for an appraisal assignment for a property on Mill Creek Road in Healdsburg, California. The email stated "I would like to know if you would be interested in placing a bid for an appraisal assignment for the following property," and the email included the following chart:

Property Address	□ MILL CREEK RD, HEALDSBURG, CA, SONOMA, 95448
Property Type	Condo
Estimated Value	\$6,000,000.00
Loan type	-
Intended Use	Limited Cashout Refinance

The email also stated, "[i]f you are interested in helping with this order, please research the property and advise your fee, turn time, and earliest available inspection date."

20. On August 21, 2024, B. F. called Respondent's employee who sent the email to notify him that the subject property was not a condo, to request additional data about the subject property that would help him with calculating his fee for this assignment and estimated completion time, and to notify Respondent's employee that providing an estimated value was "not typical of AMC practice." Respondent's employee responded verbally that he was "unaware of any violations." Respondent did not provide any additional details about the appraisal

¹ Only the complaining appraiser's initials are used to protect his confidentiality.

1 assignment to B. F. Since this incident, Respondent has not solicited B. F. to bid for or complete
2 any other appraisal assignments.

3 21. On August 19, 2025, a Bureau investigator conducted an investigatory interview of
4 Jeffrey T. Rauland, Respondent's current Designated Officer, who stated that Respondent's
5 general policies and procedures do not provide for communicating estimated values to appraisers
6 when soliciting bids for new appraisal assignments.

7 **FIRST CAUSE FOR DISCIPLINE**

8 **(Violation of Real Estate Appraisers Licensing and Certification Law –**
9 **Improperly Influenced Appraisal Assignment)**

10 22. Respondent is subject to disciplinary action under California Code of Regulations,
11 title 10, section 3721, subdivision (a)(7), in that Respondent violated Business and Professions
12 Code section 11345.4, subdivision (a)(4), because Respondent sought to influence B. F. to report
13 a minimum or maximum value for a property being appraised by providing B. F. with an
14 anticipated, estimated, encouraged, or desired valuation prior to their completion of an appraisal.
15 Specifically, as fully alleged above, Respondent sent B. F. an email soliciting B. F.'s bid for a
16 new appraisal assignment and sent B. F. an estimated value for the subject property. Complainant
17 refers to and by this reference incorporates the allegations set forth above in paragraphs 18-21,
18 inclusive, as though fully set forth herein.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Violation of Regulations – Failure to Uphold Minimum Standards for AMCs)**

21 23. Respondent is subject to disciplinary action under California Code of Regulations,
22 title 10, section 3721, subdivision (a)(7), in that Respondent engaged in conduct that constituted a
23 violation of California Code of Regulations, title 10, sections 3577, subdivision (e)(4), by failing
24 to uphold minimum standards of practice for appraisal management companies. Complainant
25 refers to and by this reference incorporates the allegations set forth above in paragraphs 18-21,
26 inclusive, as though fully set forth herein.

27 ///

28 ///

1 **DISCIPLINE CONSIDERATIONS**

2 24. To determine the degree of discipline, if any, to be imposed on Respondent,
3 Complainant alleges that on or about January 3, 2018, in a prior action, the Bureau issued Citation
4 Number A20170522-01 and ordered Respondent to pay a fine of \$2,500.00 for two separate
5 violations of Business and Professions Code section 11345.4, subdivision (e) and California Code
6 of Regulations section 3577, subdivision (g) [conditioning compensation to be paid to appraiser
7 on consummation of real estate transaction for which the appraisal was to be prepared]. That
8 Citation is now final.

9 **PRAYER**

10 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
11 and that following the hearing, the Chief of the Bureau of Real Estate Appraisers issue a decision:

- 12 1. Revoking or suspending Real Estate Appraiser License Number 1386, issued to
13 Consolidated Analytics, Inc., Jeffrey T. Rauland Designated Officer;
14 2. Ordering Consolidated Analytics, Inc. to pay the Bureau of Real Estate Appraisers the
15 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
16 Professions Code section 11409;
17 3. Ordering Consolidated Analytics, Inc. to pay the Bureau of Real Estate Appraisers a
18 fine in the amount of \$10,000.00 for each violation, pursuant to Business and Professions Code
19 section 11316; and
20 4. Taking such other and further action as deemed necessary and proper.

21
22 DATED: 12-29-2025

23 
24 TINNA MORLATT
25 Deputy Bureau Chief of Enforcement
26 Bureau of Real Estate Appraisers
27 Department of Consumer Affairs
28 State of California
Complainant

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