

**BEFORE THE
BUREAU OF REAL ESTATE APPRAISERS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

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

**Company Certificate of Registration No.
1386**

Respondent.

Case No. L20250920-01

DECISION AND ORDER

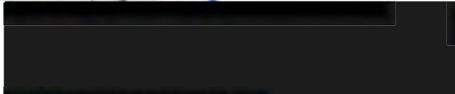
The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Chief of the Bureau of Real Estate Appraisers, Department of Consumer Affairs as the Decision and Order in the above-entitled matter.

This Decision shall become effective on

3/6/2026

It is so ORDERED

2/27/2026



FOR THE CHIEF OF THE BUREAU OF REAL
ESTATE APPRAISERS
DEPARTMENT OF CONSUMER AFFAIRS

1 ROB BONTA
Attorney General of California
2 THOMAS L. RINALDI
Supervising Deputy Attorney General
3 MICHAEL YI
Deputy Attorney General
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7 *Attorneys for Complainant*

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**

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

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

Respondent.

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

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, brought this action solely in her capacity as Deputy
24 Bureau Chief of Enforcement for Complainant, and is represented in this matter by Rob Bonta,
25 Attorney General of the State of California, by Michael Yi, Deputy Attorney General.

26 2. Respondent Consolidated Analytics, Inc. ("Respondent") is represented in this
27 proceeding by attorney Edward O. Lear, whose address is: Century Law Group, LLP, 5200 W.
28

1
2 Century Boulevard, Suite 345, Los Angeles, CA 90045; and attorney Mary Christine Brady,
3 whose address is: 18575 Jamboree Road, 9th Floor, Irvine, CA 92612.

4 3. On or about May 20, 2010, the Bureau issued Company Certificate of Registration
5 Number 1386 to Respondent. As of the date of this Stipulated Settlement and Disciplinary Order,
6 Brian G. Gehl, Aravinthan A. Wijay, Jeffrey T. Rauland, and Dana S. Gross are the Controlling
7 Persons of Respondent; and Jeffrey T. Rauland is Respondent's Designated Officer. At the time
8 of the allegations alleged herein, Richard S. Galpin, Brian G. Gehl, Aravinthan A. Wijay, Joseph
9 C. Andrea, and Dana S. Gross were the Controlling Persons of Respondent; and Richard S.
10 Galpin was the Designated Officer. The Company Certificate of Registration was in full force
11 and effect at all times relevant to the charges brought herein and will expire on January 1, 2027,
12 unless renewed.

13 JURISDICTION

14 4. Accusation Number L20250920-01 was filed before the Bureau of Real Estate
15 Appraisers, Department of Consumer Affairs, and is currently pending against Respondent. The
16 Accusation and all other statutorily required documents were properly served on Respondent on
17 December 11, 2025. Respondent timely filed its Notice of Defense contesting the Accusation.

18 5. When deemed by the Deputy Bureau Chief to be in the public interest, Complainant
19 has the authority under Business and Professions Code section 11315.5 to enter into a settlement
20 related to administrative allegations of violations of Real Estate Appraisers' Licensing and
21 Certification Law or regulations promulgated pursuant thereto, upon any terms and conditions as
22 the Deputy Bureau Chief deems appropriate.

23 6. A copy of Accusation Number L20250920-01 is attached as Exhibit A and
24 incorporated herein by reference.

25 ADVISEMENT AND WAIVERS

26 7. Respondent has carefully read, fully discussed with counsel, and understands the
27 charges and allegations in Accusation Number L20250920-01. Respondent has also carefully
28

1 read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and
2 Disciplinary Order.

3 8. Respondent is fully aware of its legal rights in this matter, including the right to a
4 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine
5 the witnesses against them; the right to present evidence and to testify on its own behalf; the right
6 to the issuance of subpoenas to compel the attendance of witnesses and the production of
7 documents; the right to reconsideration and court review of an adverse decision; and all other
8 rights accorded by the California Administrative Procedure Act and other applicable laws.

9 9. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
10 every right set forth above.

11 **CULPABILITY**

12 10. Respondent admits the truth of each and every charge and allegation in Accusation
13 Number L20250920-01.

14 11. Respondent agrees that Respondent's Company Certificate of Registration is subject
15 to discipline and agrees to be bound by the Bureau Chief's probationary terms as set forth in the
16 Disciplinary Order below.

17 **CONTINGENCY**

18 12. This stipulation shall be subject to approval by the Chief of the Bureau of Real Estate
19 Appraisers. Respondent understands and agrees that counsel for Complainant and the staff of the
20 Bureau of Real Estate Appraisers may communicate directly with the Bureau Chief and staff
21 regarding this stipulation and settlement, without notice to or participation by Respondent or its
22 counsel. By signing the stipulation, Respondent understands and agrees that it may not withdraw
23 its agreement or seek to rescind the stipulation prior to the time the Bureau Chief considers and
24 acts upon it. If the Bureau Chief fails to adopt this stipulation as its Decision and Order, the
25 Stipulated Settlement and Disciplinary Order shall be of no force or effect, and except for this
26 paragraph, it shall be inadmissible in any legal action between the parties, and the Bureau Chief
27 shall not be disqualified from further action by having considered this matter.

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1 shall be made to the Real Estate Appraisers Regulation Fund, c/o Bureau of Real Estate
2 Appraisers, 3075 Prospect Park Drive, Suite 190, Rancho Cordova, California 95670, by check or
3 money order and shall indicate on its face the notation: "BREA Case No. L20250920-01."

4 Respondent shall also submit a copy of the invoice with payment, which will be provided by
5 BREA. If full payment is not received by BREA by the date due as noted in the invoice, a 10
6 percent late penalty shall be added to the unpaid balance and interest will accrue on the unpaid
7 balance at the pooled money investment rate in effect at that time, until the full amount is paid.
8 Respondent shall not be eligible to renew its certificate until such time as full payment of the
9 outstanding costs have been made. Failure to timely reimburse BREA's costs of its investigation
10 and prosecution shall constitute a violation of the probationary order.

11 **4. Violation of Probation.** If Respondent violates probation in any respect, the Chief of
12 BREA, after giving Respondent notice and an opportunity to be heard, may revoke probation and
13 carry out the disciplinary order that was stayed. If an accusation or a petition to revoke probation
14 is filed against Respondent during probation, the Chief shall have continuing jurisdiction until the
15 matter is final, and the period of probation shall be extended until the matter is final.

16 **5. Surrender of Certificate.** During Respondent's term of probation, if it ceases
17 practicing or is otherwise unable to satisfy the conditions of probation, Respondent may surrender
18 its certificate to BREA. BREA reserves the right to evaluate Respondent's request and to exercise
19 its discretion whether to grant the request, or to take any other action deemed appropriate and
20 reasonable under the circumstances, without further hearing. Upon formal acceptance of the
21 tendered certificate, Respondent will no longer be subject to the conditions of probation.

22 Surrender of Respondent's certificate shall be considered a disciplinary action and shall
23 become a part of Respondent's certificate history with BREA. An Appraisal Management
24 Company whose certificate has been surrendered may re-apply for certification no sooner than
25 one year from the effective date of the disciplinary decision.

26 Respondent may petition to BREA for reinstatement pursuant to the provisions set forth in
27 Government Code section 11522. If, following a surrender and/or revocation of its certificate,
28 Respondent ever applies for certification to BREA and/or petitions for reinstatement in the State

1 of California, the Chief shall treat it as a new application for certification. Respondent must
2 comply with all the laws, regulations and procedures for certification in effect at the time the
3 application or petition is filed, and all of the charges and allegations contained in the Accusation
4 or Statement of Issues will be deemed true when the Chief determines whether to grant or deny
5 the application or petition. Further, Respondent shall pay the enforcement costs, fines and
6 complete all education, as specified in this Decision and Disciplinary Order prior to filing any
7 application for reinstatement or issuance of a new certificate.

8 **6. Basic Education Courses/Examination.** All of Respondent's Controlling Persons
9 and Designated Officers as of the effective date of the Bureau's Decision and Order shall
10 successfully complete, within 6 months from the effective date of the Decision and Order, a
11 BREA-approved four-hour federal laws and regulations course. Respondent must submit proof of
12 successful completion of the course(s) within 6 months following the effective date of the
13 Decision and Order. Respondent understands that it is its responsibility to ensure that the course
14 meets all of the requirements listed above and to make all necessary and preparatory
15 arrangements to take the course. Failure to comply with the education requirements as contained
16 in this Disciplinary Order shall result in an automatic suspension of Respondent's certificate of
17 registration. In order to reinstate Respondent's certificate if it is automatically suspended for
18 failure to comply with the education requirement, Respondent must provide BREA with the
19 following: (i) satisfactory verification of the completion of the education course or courses
20 imposed; (ii) completion and filing of a reinstatement application; (iii) payment of all applicable
21 fees, fines, or penalties.

22 **7. Payment of Fine.** Respondent shall pay a fine in the sum of \$10,000.00. The
23 payment shall be made within 30 days of the effective date of the Decision and Order, unless
24 BREA agrees in writing to payment plan. Payment shall be made to the Real Estate Appraisers
25 Regulation Fund, c/o Bureau of Real Estate Appraisers, 3075 Prospect Park Drive, Suite 190,
26 Rancho Cordova, California 95670, by check or money order and shall indicate on its face the
27 notation: "BRE A Case No. L20250920-01." Respondent shall also submit a copy of the invoice
28 with payment, which will be provided by BRE A. If full payment is not received by BRE A by the

1 date due as noted in the invoice, a 10 percent late penalty shall be added to the unpaid balance
2 and interest will accrue on the unpaid balance at the pooled money investment rate in effect at
3 that time, until the full amount is paid. Additionally, if payment is not received by BREa within
4 30 days of its due date, the Bureau Chief may order the full amount of the fine to be immediately
5 due and payable pursuant to Business and Professions Code section 11316(b)(3). Respondent
6 shall not be eligible to renew its certificate until such time as full payment of the outstanding fine
7 has been made. Failure to make payment on the fine shall constitute a violation of the
8 probationary order.

9 ACCEPTANCE

10 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
11 discussed it with attorneys, Edward O. Lear and Mary Christine Brady. I understand the
12 stipulation and the effect it will have on the Company Certificate of Registration issued to
13 Consolidated Analytics, Inc. Consolidated Analytics, Inc. enters into this Stipulated Settlement
14 and Disciplinary Order voluntarily, knowingly, and intelligently, and agrees to be bound by the
15 Decision and Order of the Chief of the Bureau of Real Estate Appraisers, Department of
16 Consumer Affairs. I have authority to enter into this stipulation on behalf of Consolidated
17 Analytics, Inc.

18
19 DATED: 2/24/2026



20 CONSOLIDATED ANALYTICS, INC., BY:
21 JEFFREY T. RAULAND, DESIGNATED OFFICER
22 Respondent
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1 I have read and fully discussed with Respondent Consolidated Analytics, Inc. the terms and
2 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.

3 I approve its form and content.

4
5 DATED: 2/24/2026



6 EDWARD O. LEAR, ESQ.
CENTURY LAW GROUP, LLP
7 Attorney for Respondent

8
9 I have read and fully discussed with Respondent Consolidated Analytics, Inc. the terms and
10 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.

11 I approve its form and content.

12
13 DATED: 2/24/2026



14 MARY CHRISTINE BRADY
RUTAN & TUCKER, LLP
15 Attorney for Respondent

16
17 **ENDORSEMENT**

18 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
19 submitted for consideration by the Chief of the Bureau of Real Estate Appraisers, Department of
20 Consumer Affairs.

21 DATED: _____

Respectfully submitted,

22 ROB BONTA
Attorney General of California
23 THOMAS L. RINALDI
Supervising Deputy Attorney General

24
25
26 MICHAEL YI
Deputy Attorney General
27 Attorneys for Complainant

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1 I have read and fully discussed with Respondent Consolidated Analytics, Inc. the terms and
2 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
3 I approve its form and content.

4
5 DATED: _____
6 EDWARD O. LEAR, ESQ.
7 CENTURY LAW GROUP, LLP
8 *Attorney for Respondent*

9 I have read and fully discussed with Respondent Consolidated Analytics, Inc. the terms and
10 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
11 I approve its form and content.

12
13 DATED: _____
14 MARY CHRISTINE BRADY
15 RUTAN & TUCKER, LLP
16 *Attorney for Respondent*

17 **ENDORSEMENT**

18 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
19 submitted for consideration by the Chief of the Bureau of Real Estate Appraisers, Department of
20 Consumer Affairs.

21 DATED: February 25, 2026

22 Respectfully submitted,
23 ROB BONTA
24 Attorney General of California
25 THOMAS L. RINALDI
26 Supervising Deputy Attorney General
27 
28 MICHAEL YI
29 Deputy Attorney General
30 *Attorneys for Complainant*

Exhibit A

Accusation No. L20250920-01

1 ROB BONTA
Attorney General of California
2 NANCY A. KAISER
Supervising Deputy Attorney General
3 STEPHEN D. SVETICH
Deputy Attorney General
4 State Bar No. 272370
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6734
6 Facsimile: (916) 731-2126
E-mail: Stephen.Svetich@doj.ca.gov
7 *Attorneys for Complainant*

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

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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**

Respondent.

19 **PARTIES**

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

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

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(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.

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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.

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11. Business and Professions Code section 11345.4 states:

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

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

....

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

....

REGULATORY PROVISIONS

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

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

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

....

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

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

....

(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 BREAA 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
9 or public reproof, suspend or revoke any license or Certificate of Registration, and/or
10 may deny the issuance or renewal of a license or Certificate of Registration of any
11 person or entity acting in a capacity requiring a license or Certificate of Registration
who has:

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

17

18 (b) Before issuing any private or public reproof or denying, suspending, or
19 revoking any license or Certificate of Registration issued or issuable under the
20 provisions of the Real Estate Appraisers Licensing and Certification Law or these
21 regulations, 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
therein.

23 (c) Any person or entity issued a citation containing a fine or order of
24 abatement may contest the citation by filing a written notice with the Bureau within
25 30 calendar days that states with specificity the basis of the appeal. Upon receipt of
26 such notice, the Bureau shall proceed as prescribed by Chapter 5 (commencing with
27 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
therein.

28 **FINE PROVISIONS**

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

(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,
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
regulations adopted to carry out its purposes.

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

(a) Where the Chief has verified a notice of acts or omissions by a licensed appraiser, Registrant or person or entity acting in a capacity requiring a license or Certificate of Registration which constitute a violation of statute, regulation or USPAP, he/she may issue a citation in writing which describes with particularity the 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 reproval, suspension, revocation, restriction of license, fine or any combination of these actions.

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

- (1) The gravity of the violation;
- (2) The good or bad faith of the person cited;
- (3) The history of previous violations;
- (4) Evidence that the violation was willful;
- (5) The extent to which the cited person has cooperated with the Bureau;
- (6) The extent to which the cited person has mitigated or attempted to mitigate any loss or potential loss caused by the violation; and
- (7) Such other matters as the Chief determines are in the interest of justice.

....

COST RECOVERY

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

Except as otherwise provided by law, any order issued in resolution of a disciplinary proceeding may direct a licensee, applicant for licensure, person who acts in a capacity that requires a license under this part, registrant, applicant for a 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.

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1 **FACTUAL ALLEGATIONS**

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

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

12 Property Address	□ MILL CREEK RD, HEALDSBURG, CA, SONOMA, 95448
13 Property Type	Condo
14 Estimated Value	\$6,000,000.00
15 Loan type	"
16 Intended Use	Limited Cashout Refinance

17
18
19 The email also stated, "[i]f you are interested in helping with this order, please research the
20 property and advise your fee, turn time, and earliest available inspection date."

21 20. On August 21, 2024, B. F. called Respondent's employee who sent the email to notify
22 him that the subject property was not a condo, to request additional data about the subject
23 property that would help him with calculating his fee for this assignment and estimated
24 completion time, and to notify Respondent's employee that providing an estimated value was
25 "not typical of AMC practice." Respondent's employee responded verbally that he was "unaware
26 of any violations." Respondent did not provide any additional details about the appraisal
27

28 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: 12-09-2025

23 [REDACTED]
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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