

Lori L. Schuster

From: James R. Park
Sent: Tuesday, November 28, 2017 4:18 PM
To: Lori L. Schuster
Cc: Alice M. Ritter
Subject: FW: TriStar Bank waivers

For the file

From: Glen Dale Floyd Jr [mailto:dale@fawtn.net]
Sent: Tuesday, November 28, 2017 2:44 PM
To: James R. Park <jim@asc.gov>
Subject: TriStar Bank waivers

Good afternoon Mr. Parks;

I was watching our state appraiser commission conduct business today, and was caught completely by surprise with the letter pertaining to TriStar Bank's request to use non-appraisers to perform their appraisals. They read your letter pertaining to the matter. I knew of the rule changes earlier in the year, but I assumed that clearer heads would dismiss the idea. I came from the banking industry as an executive many years ago, and this is the very thing that ended up with the mess that resulted in FIRREA back then..

I know TriStar, and I know their territories very well. I don't understand how anybody can claim Williamson County, Dickson County, or Davidson County as an under serviced area for appraisers. There are many appraisers in those areas, and many in adjacent counties that also do business in those counties. I know that as a fact.

There will be a cascade affect on other banks, as well as appraisers, in this state if the waiver happens. Competing banks will jump in the pool as well. And who will be regulating these non-appraisers doing appraisal work? Nobody. The TN Appraiser Commission would be completely powerless to enforce regulations and USPAP to non-appraisers.

Please rethink this. I would appreciate your wisdom in this matter.

If you wish to see the TN Appraiser Commission meeting, to review the discussion, it is below. Go to the 1:56 segment through 2:19.20....

<http://www.tn.gov/commerce/event/reac-board-meeting-11-28-2017>

Glen Dale Floyd, Jr., IFA
FLOYD APPRAISAL WORKS