OHFA Appraisal Standards & Requirements

OHFA Policy goal

These guidelines are intended to develop a consistent approach to measuring and evaluating the as-is value of vacant land and existing properties in projects that are seeking housing credits or gap financing resources.

Valuation Standards and Guidelines

Submission of appraisals will be required of all applicants seeking OHFA resources. The appraisal should determine the value of land and the as-is value of the building. Where there is identification by OHFA of either a vertical or horizontal business relationship between purchaser and seller, OHFA may order the appraisal in order to avoid any conflict-of-interest issues. OHFA reserves the right to limit the amount of gap funding covering the acquisition cost to the appraised value.

The definition of "As-Is Value", according to 5th Edition of the Dictionary of Real Estate Appraisals, is: "The value of specific ownership rights to an identified parcel of real estate as of the effective date of the appraisal; relates to what physically exists and is legally permissible and excludes all assumptions concerning hypothetical market conditions or possible rezoning. The term **As-Is** Market Value applies to both physical condition and legal status of the property." OHFA will only use the "As-Is" value for basis allocation, gap financing, and underwriting purposes. This value will be determined either by using the restricted rents, as required by existing financing, land use requirements, or market rents (when income restrictions or land use restrictions have expired, or if the owner has the option to opt out). When using market rents, market value will be determined by a Rent Comparability Study (to be prepared in accordance with the *Uniform Standards of Professional Appraisal Practice (USPAP)* and the *HUD Chapter Nine REV 1-15-08*, as it references the requirements of the Study. Market rents must be determined in the appraisal in accordance with *HUD Chapter Nine REV 1-15-08, Rent Comparability Studies*.

The appraiser is directed to include, at a minimum, the Sales Comparison for vacant land and existing properties **and** the Income Capitalization Approach to market value in the appraiser's report. When utilizing the capitalization rate in the Income Approach, the appraisal should be supported by an analysis of sales data extracted and verified from the market, investor sources and published data, such as the *Korpacz Real Estate Investor Survey*. Although the ***Band of Investment Method*** or ***Gross Rent* Multiplier** is used and recognized, OHFA will rely only on the capitalization methodology to support the As-Is value. Favorable financing terms and the value of the housing tax credits should not be used for determining a cap rate.

An appraisal market area is defined as the subject development's neighborhood or Primary Market Area (PMA). Although in some markets, the identification of comparable properties may be difficult, OHFA encourages the appraiser to identify property that has physical and locational (nearest location) characteristics similar to those of the subject property. For example, comparable properties (“comps”) in rural areas should be the best available within a reasonable distance and limited to similar properties and locations within the subject’s county or contiguous counties and not similar properties from locations that are two counties away. Using sales of comps or existing projects from other regions of the State of Ohio will not be acceptable. OHFA may require the appraiser to update its existing report to match these guidelines, or OHFA may order an additional appraisal, to be performed by an independent third-party appraiser, to be determined at OHFA’s sole discretion, and at the cost of the applicant.

OHFA will rely upon the appraisal to determine:

(A) “Land Only” Value:
The value of the land is the same, with or without improvements or restrictions. This value should be based on similar land sales in the market or the value of the “land only” of similar vacant land sales in the market.

(B) As-Is Building Value (restricted rent):
The value of the building should be based on similar property sales in the market using current restricted rents being charged by the subject property, based on the income approach. In the report, the appraisal should list separately the values of land and of the building.

(C) As-is Building Value (market rent):
The value of the building should be based on similar property sales in the submarket using current market rents as determined by the *Rent Comparability Study* based on the income approach. In the report, the appraisal should list separately the values of land and of the building. Market rents may be used when the project is no longer subject to financing, income, rent or other restrictions.

To achieve the appropriate valuation for an existing project with rent, income, or land-use restrictions, the appraiser must consider only restricted rents to determine the value. If the property owner has the option to “opt out” of affordable housing due to the expiration of existing income or land-use restrictions, OHFA will rely on the unrestricted or market rents supported in the Report by including a *Rent Comparability Study,* provided the market rents can be determined to incentivize an owner to opt-out. Therefore, the Report may site both the restricted and market rent values.

Pursuant to the Qualified Allocation Plan (QAP), OHFA will require an As-Is Appraisal for rehabilitation proposals, adaptive reuse developments, and for the purpose of valuing vacant land when receiving a reservation of Housing Credits or an award of OHFA gap financing. If there are any unresolved concerns about valuation or methodology, OHFA may, at its own discretion, order an additional appraisal. If the value indicated in the additional appraisal is within five percent (5%) of the value, an average of the two values will be calculated and used; otherwise OHFA will evaluate the credibility of the assumptions and validity of all of the information in each appraisal either prior to accepting the lower valued appraisal for allocation and gap funding. The only exception to OHFA ordering an additional appraisal is for rehabilitation proposals or adaptive reuse developments that have Rural Development ("RD") or Housing & Urban Development ("HUD") financing. In those instances, OHFA may accept the RD and HUD appraisals so long as the as-is value methods described in these guidelines are identified within the HUD or RD Appraisal Report. In situations where it is necessary for OHFA to order an appraisal, the cost of such appraisal will be based on the complexity of the assignment; the cost of the appraisal will be the sole responsibility of the applicant. OHFA will communicate the fee to the applicant in writing. Appraisals will not be ordered until OHFA receives the fee, which may result in a delay of the issuance of a Binding Reservation Agreement, the Housing Credit Eligibility Letter ("42(m) letter"), or in presenting the proposal to the OHFA Multifamily Committee and OHFA Board for their consideration.

In the event OHFA orders an appraisal, to ensure a consistent level of quality in appraisal reports and to reduce administrative costs, OHFA will develop a list of previously approved appraisers with experience evaluating and appraising Housing Credit properties.

With respect to those appraisals that OHFA will accept, including those from RD and HUD, the appraisal must be dated no more than twelve (12) months prior to the LIHTC application deadline. For appraisals that are older than twelve (12) months, if there are no material changes to the development and/or market, the appraiser may provide an updated cover letter. If there are material changes, the appraisal must include detailed explanations regarding those changes.

Any appraisal submitted to OHFA in connection with a Tax Credit application will become OHFA's possession, who may continue to rely on it for the purposes of determining the market feasibility of the proposed development, regardless of any unresolved concerns between the Applicant and the party that provided the appraisal.

As a result of the approved appraisal(s), OHFA will re-evaluate the project allocations for any change or shortage of sources and/or uses. In the event that multiple appraisals have been ordered in connection with the same project, the Applicant/Sponsor agrees to provide and release all copies to OHFA to use at its sole discretion.

If there are inconsistencies between representations in the Tax Credit application and those in the appraisal (such as architectural features, unit amenities, site amenities, operating expenses, rents, etc.), OHFA may rely upon the application (including supporting documentation) and its underwriting comparison of all data presented on which to base its recommendation and allocation decisions. In some instances, this will reduce the requested amount of housing credits or gap financing resources to the project.

APPRAISAL REPORT GUIDELINES

Appraisal Reports prepared for OHFA must be presented in narrative PDF format or other format appropriate for the transaction, as approved by OHFA. The scope of the appraisal report should be in proportion to the complexity of the property and the intended use of the appraisal. The appraisal should, at a minimum, conform to generally accepted appraisal standards as evidenced by the *Uniform Standards of Professional Appraisal Practice (USPAP)*, which are incorporated into these guidelines.

USPAP permits that the results of the appraisal may be communicated either in a "self-contained", "summary" or "restricted" report format, as defined by USPAP. Unless otherwise instructed, all Reports must be in a self-contained format. Per the advisory opinions provided by USPAP, preparation of appraisals for subsidized housing in compliance with USPAP requires knowledge and experience that goes beyond typical residential appraisal competency. Subsidized housing may be defined as single- or multi-family residential real estate, targeted for ownership or occupancy by low- or moderate-income households, as a result of public programs and other financial tools that assist or subsidize the developer, purchaser, or tenant in exchange for restrictions on use and occupancy. The US Department of Housing and Urban Development (HUD) provides the primary definition of income and asset eligibility standards for low- and moderate-income households. Other federal, state, and local agencies define income eligibility standards for specific programs and developments under their jurisdiction, including Rural Housing Development.

USPAP further states that subsidized housing appraisals require the appraiser to understand the various programs, definitions, and pertinent tax considerations involved in the particular assignment, applicable to its location and development. An appraiser should be capable of analyzing the impact of the programs and definitions in the local subsidized housing submarket, as well as in the general market that is unaffected by subsidized housing programs. Appraisers should also be aware of possible political changes that will affect the durability of the benefits and restrictions of subsidized housing projects, and must fully understand the interpretations and enforcement of subsidy programs.

<u>Guidelines, Provisions, and Definitions</u>

General Report Provisions

Self-contained Reports must describe sufficient and adequate data and analyses to support the final opinion of value(s). The final value(s) must be reasonable, based on the information included. Any third party reports relied upon by the appraiser must be cited in the Report with the conclusions from those third party reports included in the Report. The Report must contain sufficient data, included in the appendix when possible, an analysis to allow the reader to understand the property being appraised, the market data presented, analysis of the data, assumptions of the appraisal, and the appraiser's conclusion. The complexity of this requirement will vary in direct proportion with the complexity of the real estate and interest being appraised. The report should lead the reader to the same or similar conclusion(s) reached by the appraiser.

For allocation and valuation purposes, OHFA will rely on the Sales Comparison and Income Approach for existing, improved properties. If an approach is not applicable to a particular property, then omission of such approach must be fully and adequately explained by the appraiser. An adjustment grid demonstrating the appraisal methodology and reconciliation must be included (i.e., comparables of land, sales, rents, capitalization rates, etc.), as applicable.

Cost Approach
The Cost Approach should give a clear and concise estimate of the cost to construct or, if applicable, to renovate the subject property. The type of cost (reproduction or replacement) and source(s) of the cost data should be reported. Cost comparables are desirable; however, alternative cost information may be obtained from *Marshall & Swift Valuation Service* or similar publications

If the appraiser relies only on third party publications, a comparison analysis (of the validity and reasonableness of cost as they relate to current and existing construction and material conditions) must be provided. OHFA will not base its determination of value solely on the Cost Approach.

Sales Comparison Approach
This section should contain an adequate number of sales to provide the reader with the current market conditions concerning this property type. Sales data should be recent and specific for the property type, using comparable appraised properties located within the subject's PMA. OHFA will not recognize an appraisal for valuation purposes that utilizes comparable sales in regions of the county or state other than that of the subject's PMA.

Income Approach
This approach should analyze both the actual historical and projected income and expense aspects of the subject property. For existing properties, OHFA will rely on this approach to determine the As-Is value. Inclusion of soft debt or other favorable financing to determine value should not be considered by the Appraiser. The appraiser should provide a comparison grid that leads the reader to similar conclusions.

Standards to be reviewed by OHFA

There are industry standards established for the use of the Appraiser in preparing of Reports and for rendering opinions of value. OHFA will rely on the appraiser to utilize those established standards and guidelines for OHFA's purposes.

OHFA will rely on the appraiser's qualifications and certification submitted to the agency. The appraiser certifies that, at a minimum, the individual assigned to appraise the development is:

(A) In "good standing" with and in possession of a current license with the Ohio Real Estate Appraiser Board, as required by the Ohio Department of Commerce; and
(B) In "good standing" with and up-to-date with USPAP's approved examination requirements, as well as having met its education and experience requirements,

including a certificate of completion of the Uniform Standards of Professional Appraisal Practice (USPAP) course from The Appraisal Institute.

The appraiser warrants that he/she is in compliance with all applicable state and federal licensing and certification regulations in the State of Ohio and has not been given by their client or any other interested party, information pertaining to the valuation being sought. The appraiser must certify they have not reviewed a sales or option agreement, closing statements, been privy to any conversations about, or reviewed documents that would impact their opinion of value as referenced by Exhibit "A", attached.

DEFINITIONS, POLICY, & STANDARDS

The following terminology or standards are employed in the review process:

Acquisition Cost. The proposed acquisition price is verified by OHFA with the fully-executed site control document(s) for the entire proposed site.

(A) **Excess Land Acquisition**. Where more land is being acquired than will be utilized for the site, and the remaining acreage is not being utilized as permanent green space as written in the deed restrictions or covenants, the prorated appraised value of the proposed development will be based on acreage square footage, number and total square footage of units, deducted from the total cost as reflected in the site control document(s). An appraisal containing segregated values for the total acreage, the acreage for the subject site and that of the remaining acreage, and/or the tax assessment value may all be tools at the OHFA Underwriter's disposal in making a proration determination based on relative value; however, the OHFA Underwriter will not utilize a prorated value greater than the total amount in the site control document(s).

(B) **Identity of Interest Acquisitions**: The acquisition will be considered an identity of interest transaction when it involves the current or past owner (during the 36 months prior to application), in whole or in part, of an affiliate or Related Party, or an owner (at any level) of the Development Team or permanent lender of the proposed property.

i. The applicant has disclosed all identity of interest transactions subject to the OHFA Good Partnership Policy.
ii. Disclosure must be provided related to any agreements that may impact value, payments from seller to buyer, or any other party to the transaction.

Transactions that are presented for allocation authority to OHFA must provide certification from a licensed Certified Public Accountant that describes the partnership structure, inside and outside "exit" tax consequences, and the amount of the tax liability under current law for all parties of the ownership. This analysis of tax liability (if any) must be provided at the time of application. In the event that no tax liability exists, the CPA shall provide a signed statement certifying same.

Acquisition of Buildings for Tax Credit Allocations. In order to make a determination of the appropriate building acquisition value, the Applicant will provide, and the OHFA Underwriter will utilize, an appraisal that meets OHFA's Appraisal Rules and Guidelines. The building acquisition value utilized by the OHFA Underwriter will be equal to the lowest value of the following:

(A) The Applicant's claimed building acquisition value; or
(B) The building acquisition value that results from the proration of the actual acquisition cost or identity of interest adjusted acquisition cost based upon a calculated As-Is improvement value over the total As-Is value provided in the appraisal; or
(C) The actual acquisition cost or Identity of Interest adjusted acquisition cost, minus the amount of the appraisal's stated land value; or
(D) The actual cost as demonstrated by the mortgage closing statement.

Appraisal: The act or process of developing an opinion of value; an opinion of value of, or pertaining to, appraising and related functions such as appraisal practice or appraisal services. The Appraisal is to be performed in accordance with current Uniform Standards of Professional Appraisal Practice (USPAP) published by the Appraisal Institute.

Appraisal Standards: Minimum requirements established by USPAP and supplemented by the lender or credit enhancement provider.

Capitalization Rate: A capitalization rate is used in the direct capitalization method. It is used to convert an estimate of a single year's income expectancy or an annual average of several years' income expectancies into an indication of value in one step by dividing the income estimate by the rate, which is typically derived from market analysis or through other quantitative methods.

> NOTE: Several capitalization methods may be utilized in the Income Approach. The appraiser should present the method(s) reflective of the subject market and explain the omission of any method not considered in the report. The appraiser must provide support for the selection of the capitalization rate.

Direct Capitalization: The primary method of deriving an overall rate (OAR) is through market extraction. Although the Band of Investment or mortgage equity technique is recognized, for valuation purposes of existing property, OHFA will only accept detailed reconciliation and support related to the Capitalization Rate. The assumptions must be fully disclosed, discussed and reconciled across the comps that were used to determine value.

Date of Appraisal: The appraisal report must be dated and signed by the appraiser who inspected the property (i.e., appraiser engaged by OHFA). The date

of the valuation, except in the case of proposed construction or extensive rehabilitation, must be current. OHFA will accept appraisals that are up to twelve (12) months old.

Expense Analysis: Actual expenses for the subject property (if applicable), along with the owner's projected budget, must be reported, summarized, and analyzed by the appraiser. If such data is unavailable, a statement to this effect is required and appropriate assumptions and limiting conditions should be stated. Expense comps of three (3) or more similar properties are required. Utilization of comparable properties outside the PMA is not acceptable in evaluating operating data or to determine value. For example, comps in rural areas should be limited to similar properties and locations within the subject's county or contiguous counties and not similar properties from locations that are two counties away. Historical expenses of published survey data (e.g., IREM, BOMA, etc.) may also be considered but must be supported by expense comparables. Market-rate expense comps are to be used for market-rate analyses and restricted / subsidized expense comps are to be used for restricted rent analyses. Any expense differences should be reconciled. The following expense data should be considered:

(A) Historical data regarding the subject property's assessment and tax rates (recommended).
(B) A statement listing any delinquent taxes, if any. A tax plat of the subject property should also be included in the report.
(C) Survey data from OHFA, IREM, BOMA, etc, as additional information. The information may be included in the report if necessary for comparability purposes.

Harmonization with HUD & RD: OHFA will accept appraisals from HUD and RD that include multiple valuation methodologies. OHFA will consider using those appraisals so long as the As-Is Market Value determined by the HUD or RD appraisal meets the standards and definition within these guidelines.

Highest and Best Use: A fundamental concept in the valuation of real estate, defined as follows:

"The reasonably probable and legal use of vacant land or an improved property, which is physically possible, appropriately supported, financially feasible, and that results in the highest value. The four criteria the highest and best use must meet are legal permissibility, physical possibility, financial feasibility, and maximum profitability."

The highest and best use of the land, considered separately **as if vacant** and available for development, may differ from the highest and best use of the property **as improved** with existing building improvements. Therefore, for improved properties, a separate analysis of highest and best use must be developed for each of the following:

(A) The site as **if vacant**.
(B) The site as **improved**.

The only exception in valuing land “as if vacant” is when the site has been developed to an intensity that is higher than would be allowed under the current zoning. If the remaining economic life of the building improvements is sufficient, the land is valued according to the intensity of development. By doing so, an economic balance is maintained between the agents of production (land, labor, capital, and coordination), which will result in a more accurate value indication. Factors that must be taken into consideration in determining the Highest and Best Use of the property include the following:

(A) Existing land use regulations.
(B) Probable modifications to the existing land use regulations.
(C) Economic demand.
(D) Physical adaptability of the property.
(E) Neighborhood trends.
(F) Optimal use of the property.

The Highest and Best Use must recognize the intended use of the project. Should the property zoning be valued higher, the appraisal report must reflect the difference in use and demonstrate support for the recommended valuation.

Intended User: OHFA must be identified by the appraiser as an intended user.   The client and OHFA, (as well as any other party) are identified by name or type as users of the product (i.e., the appraisal, the appraisal review, or appraisal consulting report) by the appraiser on the basis of communication with the client at the time of assignment.

Market Value: The most probable price that a property should bring in a competitive and open market, under all conditions requisite to a fair sale, with the buyer and seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Implicit in this definition are the consummation of a sale as of a specified date and the passing of title from seller to buyer under conditions whereby:

(A) Buyer and seller are typically motivated;
(B) Both parties are well informed and/or well advised, and both are acting in what they consider their own best interests;
(C) A reasonable time is allowed for exposure in the open market;
(D) Payment is made in terms of U.S. dollars or in terms of financial arrangements comparable thereto; and
(E) The price represents the normal consideration for the property sold, unaffected by special/creative financing or sale concessions granted by anyone associated with the sale.

Market Value "As Is", subject to Restricted Rents on Appraisal Date: An estimate of the investment value of a property in the condition observed upon inspection and as it physically and legally exists without hypothetical conditions, assumptions, or qualifications, as of the effective date the appraisal was prepared, from the definition of Market Value above. OHFA will rely predominantly on the valuation using restricted rents on appraisal date, unless circumstances permit utilization of market rents as defined within these guidelines.

Market Value, subject to Restricted Rents, considers any rental limitations, rental subsidies, expense abatements, or restrictive-use conditions that may be imposed by any government or non–government financing sources but does not consider any favorable financing involved in the development of the property.

Market Value, subject to Restricted Rents, refers only to the value of the subject real estate, as restricted, and excludes the value of any favorable financing. It is based on a proforma that projects income, vacancy, operating expense and reserves for the property under a restricted (subsidized) scenario. This restricted proforma includes each of the scheduled restricted rents, a vacancy and collection loss factor that reflects any rental assistance (RA) or Section 8, and operating expenses and reserves projected for the subject as a subsidized property.

Qualified Appraiser: Any individual who has satisfied experience and qualifications relating to a specific appraisal assignment relating to USPAP, HUD, RD, or OHFA policy. While membership or lack of membership in an appraisal organization may be a consideration in accepting or rejecting the qualifications of an individual appraiser, the determining factor is the appraiser's professional integrity, education, and experience in addition to his/her state certification or licensing status. The appraiser's experience and training must be appropriate to the complexity and nature of the proposed appraisal assignment.

Reconciliation and Final Value Estimate: This section of the report should summarize the approaches and values that were utilized in the appraisal. An explanation should be included for any approach which was not included. Such explanations should lead the reader to the same or similar conclusion of value. Although the values for each approach may not "agree", the differences in values should be analyzed and discussed.

Other values or interests appraised should be clearly labeled and segregated. Such values may include FF&E, leasehold interest, excess land, etc. In addition, rent restrictions, subsidies and incentives should be explained in the appraisal report and their impact, if any, needs to be reported in conformity with the Comment section of USPAP Standards Rule 1-2(e), which states, "Separation of such items is required when they are significant to the overall value." In the appraisal of subsidized housing, value conclusions that include the intangibles arising from the programs should also be analyzed using a scenario that does not include the intangibles so that their influence on the value can be measured.

The Minimum Report Requirements:

(A) The final report will be submitted to OHFA no later than either a) the date indicated in the Qualified Allocation Plan, b) the date requested as a condition of funding, or c) the date agreed upon in the Notification to Proceed Letter as issued by OHFA, and submitted to the prospective appraiser at the time of engagement.

(B) The appraisal shall consist of a self-contained Title XI narrative report. The Letter of Transmittal must include wording explaining that the appraisal is prepared in conformance to the Uniform Standards of Professional Appraisal Practice (USPAP) published by the Appraisal Foundation and Title XI of the Federal Financial Reform, Recovery and Enforcement Act of 1989 (FIRREA).

(C) The primary appraiser should sign the report. All personnel assisting in the preparation and analysis of the appraisal should be identified in the report by name and title.

(D) The appraiser will include evidence of having purchased Errors and Omissions Insurance and provide a copy of its State Certification in the addenda of the report.

(E) The appraiser will indicate in both the Letter of Transmittal and in the Summary of Important Conclusions, any special assumptions and/or limiting conditions pertaining to the appraisal assignment.

(F) The appraiser will determine the appropriate flood zone using the correct Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map and include this information in the summary section of the report.

(G) The appraiser must make contact with the local municipal zoning office to verify, in detail, the development’s level of conformity to the local zoning code. In addition, the appraiser will indicate the threshold and reconstruction limits in the case of a legal non-conforming use.

(H) If the development is located on a subdivided parcel, the appraisal must be broken down by subdivision.

(I) The appraiser will contact the locality’s tax assessor to analyze the imposition of current and projected real estate tax on the development. The analyzation should include tax abatements, if any.

State Licensed Appraiser: OHFA requires that an Ohio-licensed appraiser perform any appraisal that is used in a federally-related financial transaction.

USPAP: Uniform Standards of Professional Appraisal Practice established and amended by the Appraisal Standards Board of the Appraisal Foundation.

Value Estimates: OHFA is requesting the appraiser to provide as is value as listed below. When a value is determined by the appraiser for existing properties, the appraiser is requested to reflect a total value that can be broken down into a value of the improvements, and a value of the land. All commissioned appraisal Reports shall include the following values, as applicable:

(A) As-Is Market Value with restricted rents;
(B) As-Is Market Value with market rents; and/or
(C) As-Is land value (unimproved – vacant land)

If personal property, FF&E, or intangible items are not part of the transaction or value estimate, a statement of such should be included. OHFA will focus allocation decisions for existing buildings on the As-Is Market Value. Vacant land appraisals will utilize the As-Is Market value.

Exhibit “A”

Appraiser’s Affidavit

This Appraiser’s Affidavit is executed this ___ day of __________, 201__ by _______________________________, an Ohio _____________________________, (“Appraiser”) who hereby represents, warrants and covenants to Ohio Housing Finance Agency, the following:

1. Appraiser has read the OHFA Appraisal Standards and Requirements (“Guidelines”) and has been and shall remain in full compliance with said Guidelines during any and all such time as OHFA deems necessary to review and evaluate the appraisal conducted by Appraiser in connection herewith .

2. Appraiser is in no way a related party to, nor has any pecuniary interest in, any entity which has either an ownership, leasehold, creditor, development, vendor/vendee or any other financial interest or rights in or to (i) the subject property being appraised or (ii) any entity, subsidiary or related entity to any transaction in connection with the subject property being appraised.

3. Appraiser shall indemnify OHFA and hold the same harmless from any and all liability, cause of action or damages of any kind as a result of Appraiser’s misrepresentation, fraud or negligence in connection with the representations contained in this Affidavit.

IN WITNESS WHEREOF, the undersigned has executed this Affidavit as of the date herein above.

Appraiser:

By:____________________

Its:____________________