



The American Guild of Appraisers

Guild #44 OPEIU / AFL-CIO

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7 April 16, 2018

8 Federal Trade Commission

9 In the matter of FTC V CoreLogic

10 FEDERAL TRADE COMMISSION [Docket No. C-4458] CoreLogic Inc.

11 ACTION: Proposed consent agreement

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13 Gentlemen:

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15 The American Guild of Appraisers is writing on behalf of our own appraiser members and our parent
16 union's 12,500,000 members, who are also voters and taxpaying consumers.

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18 In addition to the proposed Order revising the Order originally in place, we urge FTC to stress the
19 obligation of CoreLogic to abide by the Order.

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21 We wish to add our voice to those views already expressed by State Appraiser Coalitions and other
22 professional peer associations in this matter.

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24 In addition, we urge the FTC to **expand its current and past reviews of CoreLogic and First**
25 **American Real Estate Services.**

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27 Between these two previously affiliated corporations 100% complete control over many real estate
28 transactions from start to finish are held. Virtually ALL consumer checks and balances have come
29 under the complete control of one of these two entities in transactions they manage.

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31 While this appears to be competition at work on the surface, nothing could be further from the reality.
32 CoreLogic owns and operates one of the largest, most powerful Appraisal Management Companies
33 in the nation. They are so large that some of their more objectionable practices are frequently
34 emulated by other AMCs.

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36 CoreLogic's AMC has a negative reputation with appraisers across America for alleged improper
37 attempts to coerce appraisers to hit higher values to 'make deals.'

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39 When honest appraisers resist; they are subjected to false complaints made to the state for CL to
40 justify ordering secondary appraisals where compliant appraisers have already been directed what
41 value to hit and which outside of the area comparables to use to hit that value.
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43 It's alleged that this turning in process is twofold (1) broad intimidation and (2) to create a false
44 appearing paper trail of Dodd Frank compliance.
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46 **CoreLogic owns the following services that directly impact consumers:**

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48 **Matrix MLS** (used by agents and appraisers alike to gather listing information)

49 **Realist Tax** (used by agents and appraisers to verify public records related to the above sales-
50 frequently conflicts with their own other data).

51 ACI Software) Bought by First American. Used to publish forms for their former PACE PRO product
52 which was so non-compliant and misleading that even the FFIEC and ASC got involved in stopping
53 that product. B buying the second largest appraisal software provider FA can mislead novice or lesser
54 experienced low fee appraisers into thinking their non USPAP compliant forms are compliant when
55 filled out as directed.

56 **Appraisal Port** (FNC) This is one of very few mandatory options for uploading completed appraisal
57 reports to regulated GSEs

58 **Appraisal Scope** (Owned by CoreLogic) Same as Appraisal Port. Controls the upload process but
59 ALSO enables CoreLogic to scrape or 'mine' data from private, confidential appraisals uploaded
60 through their system.

61 **Mercury Network** -Owned by CoreLogic-this is a purported alternative to using AMCs-owned by
62 CoreLogic, it essentially strips away what little compliance protection still exists through use of AMCs.
63 It allows lenders to pick their own cooperative appraisers.

64 **Data Courier**

65 **Marshall and Swift**, CoreLogic-previously the foremost cost service in the country.

66 **FloodCert.com**- A common report requirement is flood data. CL controls access.

67 **LSAM**

68 **RELS (now CoreLogic w/ staff appraisers)**-Routinely uses coercion to pressure appraisers to hit
69 higher appraisal results.

70 **Columbia Institute** The oldest appraisal association in America-purchased for its imprimatur of
71 legitimacy-which is meaningless now that CL bought it out. CI no longer HAS a reputation at all.

72 **Real Quest** (like their Realist services-though often with different results) used by government
73 agencies, appraisers and agents alike

74 **RealAVM** an automated valuation software program that is grossly misleading to agents and
75 consumers alike. Experienced appraisers know never to use it.

76 **The Appraisal Foundation**-while not owned by CL, they did recently (November 2017) have one of
77 their employees appointed to the Board of Trustees of this appraisal rule making body that writes
78 USPAP.

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80 FTC, the full reach of both CoreLogic and First American comprise a monopoly that no one can
81 effectively compete with in almost all the above elements. They are simply too broad.

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Also, when one or two entities with no human being responsible for federal requirements for honesty or compliance with consumer protection provisions exist to the exclusion of any viable competitors, then the consumer / taxpayers suffer.

We urge the FTC to contact either ourselves or any of the coalitions that have already written on this issue. AGA may be reached at the contacts below.

Respectfully Submitted,



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