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Request Overview			

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Appraisal Review	

Critical Review (USPAP / Appraisal Institute–Oriented) of Appraisal Report

Subject: ███████████████████████████
Effective date: 06/05/2023
Reported opinion of value: $478,000
Reported contract price: $500,000 (contract dated 05/02/2023)
Key reported physical summary: Circa 1780 "Farm House", 2-story, 2,120 sf GLA, 3 br / 2.0 ba, 20.00 acres; EBB heat, no central A/C; multiple outbuildings incl. large detached garage/workshop/barn.

Executive Summary – Material Deficiencies Most Likely to Affect Credibility

High-risk credibility issues (material under USPAP "credible assignment results" standard):

- **Comparable selection is poorly matched to a circa-1780 dwelling** (comps primarily ~2006–2008 era; "age adjustments not utilized" policy is asserted rather than convincingly market-demonstrated). This is a classic "substitution" and "marketability" risk in older/unique property valuation.
- **GLA adjustment application appears inconsistent and/or inadequately supported**: the report states $15/sf for above-grade GLA, yet the line-item adjustments for GLA do not reconcile cleanly to $15/sf in all cases, suggesting either (a) math error, or (b) additional unreported assumptions embedded in the adjustment.
- **Site (acreage) adjustments are extremely large** (+$100,000; +$50,000; -$20,000) with only a generalized narrative (and later "per-acre" explanation in a post hoc clarification). The report does not show the land-sales grid/extraction that would allow the reader to replicate the site value conclusion.
- **Internal inconsistency regarding exposure/marketing time** (multiple statements: "under 3 months"; "3–6 months exposure time"; "1–3 months marketing time"). The report does not reconcile these in a single, well-supported conclusion tied to the effective date market.
- **Sales history narrative and condition reporting conflicts**: the report calls the subject C4 and "bathrooms not updated," yet later addendum claims "new bathroom" and suggests the condition should have been higher (average+/good). This is a material discrepancy because the condition rating drives comp selection and adjustments.

Items that appear generally consistent with publicly available sources (limited verification):

- At least one comparable's basic sale price/date aligns with public real estate portal data (e.g., ████████████████ sold 09/29/2022 for $400,000). ███████████████████████████████████ ███████████████████████████)
- Subject's prior sale appears consistent with a public listing record (sold 05/28/2021 for $375,000; MLS ███████████). ██ ██████████████████████████

Standards Framework Used in This Review (Why These Issues Matter)

This critique is grounded in USPAP's requirements that an appraisal must be developed with a scope of work sufficient to produce **credible** results and reported in a manner that is **not misleading**. Key USPAP touchpoints include:

- **SR 1-1(a),(b),(c)**: avoid significant errors; do not render services in a careless/negligent manner; analyses must be supported.
- **SR 1-2**: proper identification of the problem, including characteristics relevant to assignment results.
- **SR 1-4(a)**: when using the Sales Comparison Approach, analyze comparable sales and apply adjustments supported by market evidence.
- **SR 2-1 / 2-2**: report must contain sufficient information to enable intended users to understand the report and not be misleading.

From *The Appraisal of Real Estate* (Appraisal Institute), this review emphasizes: (1) the principle of substitution; (2) consistent units of comparison; (3) appropriate bracketing; (4) supported and replicable adjustments; and (5) reconciliation consistent with the quality of evidence.

1) Factual Inaccuracies / Data Integrity Risks (Ownership, taxes, zoning, flood, site)

1A. Taxes – Plausibility and internal consistency

- The report lists annual real estate taxes as **$1,292** (Tax Year 2022). This may be plausible for ▮▮▮▮ but the report provides no assessor printout, levy breakdown, or verification reference beyond "tax records." For a property with 20 acres and multiple outbuildings, this is a data element that should be easily documentable and replicable.
- **USPAP risk:** If taxes are wrong, it can mislead lender/underwriter about holding costs and marketability for some buyers. While taxes do not directly set market value, inaccurate reporting is still a problem under SR 2-1 (misleading) and SR 1-1(a) (significant errors).

1B. Zoning / land use controls

- Report states: **"No County Zoning"** and "No zoning/Typical in ▮▮▮▮▮▮ This may be generally true in parts of ▮▮ but the report does not address:
  - Subdivision covenants/restrictions (the legal description contains "CCCONS 1,1.1,1.17,1.39" suggesting recorded covenants/conditions).
  - Whether the property is impacted by agricultural districts, conservation easements, floodplain ordinances, or state environmental constraints.
- **Material deficiency:** A property can have "no zoning" yet still have deed restrictions that materially affect highest and best use and marketability. The report's statement that "No zoning… allows the subject to be rebuilt if needed" is an **unsupported inference** without confirming setbacks, septic replacement feasibility, floodplain/wetlands, and any recorded restrictions.

1C. Flood zone / FEMA mapping

- Flood is reported as **Zone X** with panel ▮▮▮▮▮▮ dated 11/07/2002. The report also describes neighborhood boundaries including **Capon River** north and south, and aerial/map shows proximity to watercourses. In river-influenced areas, the appraiser should be especially careful:
  - Whether any portion of the 20 acres lies in a SFHA even if the "homesite" is not.
  - Whether portions are in floodway/AE but improvements are outside.
- **Deficiency:** The report does not provide a FEMA map image or depict the improvement location relative to flood layers. "X" may still be correct, but **the narrative is weak given the stated river influence**.

1D. Site size and land valuation

- Site is shown as **20.00 acres** and valued at **$150,000** in the cost approach ("$7,500/ac" implied in later clarification). However, the original report does not provide the land sales used to support site value—only "Site value is from vacant land sales comparison."
- **USPAP SR 1-4(a) / SR 2-1 issue:** If land contributes materially (here it does), the report should summarize land sales or extraction in a way that is replicable. Without it, the user cannot evaluate whether the large acreage adjustments are credible.

2) Market Area / Neighborhood Description – Accuracy and Support

2A. Market conditions addendum (1004MC) appears underdeveloped

- The 1004MC grid is effectively nonfunctional for analysis: the "current–3 months" column indicates **0 sales** and the report then concludes trends are "stable" largely because the market is rural and data is limited.
- "Limited data" can be valid, but under USPAP the appraiser must still produce credible results by expanding scope of work as needed (e.g., broader geographic competitive set, longer lookback, alternative data sources, or paired-analysis/regression with adequate explanation).
- The narrative states "average time on the market... April 2023 was 34 based on 18 sales," but the report does not identify the MLS query parameters (price band, acreage filter, property type). This is not replicable and may not reflect the subject's true competitive segment (historic farmhouse + 20 acres + multiple outbuildings).

2B. Data-source expectations ("Use sources like Realtor, Zillow...") – what can be verified today

Because your instruction requires use of public portals, I verified several comparable records with major public real estate platforms and IDX mirrors. Key items:

- ██████████████████████ shows sold 09/29/2022 for $400,000 on Zillow/IDX mirror sites. ([longandfoster.com]
- ████████████████████████████ is widely reported as sold 09/28/2022 for $455,000 ████
- ██████████████████████ is reported sold at $440,000 on broker IDX mirror. ████████

However, modern portal "market trend" widgets (e.g., Redfin zip trends) are updated far beyond 06/2023 and are not a clean substitute for the appraiser's effective-date analysis.

3) Site / Improvement Description – Photo-based Consistency Review

3A. Condition rating vs. photo evidence vs. narrative conflicts

- Subject is rated **C4** and narrative says "Kitchen updated one to five years ago; Bathrooms not updated," but elsewhere the report says "Home has new bathroom, new wet bar, some new flooring..."
- The later "Clarifications requested 1/17/2024" addendum states the report "should have also shown updated bath" and "condition should have been changed to average+ to good." This is effectively an admission the original condition reporting may be wrong or incomplete.
- **Materiality:** Condition (C3 vs C4) can swing value materially, especially when comps are newer homes where condition is already competitive. If the subject truly merits C3 (or C4+ in narrative terms), the comp adjustments and/or selection should reflect that in a transparent, supported manner.

3B. Bedroom/bath count and functional utility

The sketch and interior photo labels suggest a conventional 3-bedroom/2-bath layout, but the report's narrative also references older materials (plaster/panel) and an attic. For a circa-1780 home, functional obsolescence risks (low ceilings, layout constraints, stair geometry) are common and should be addressed explicitly. The report largely asserts "flow similar to modern homes" without presenting objective support.

3C. Outbuildings and contributory value

- The subject has multiple substantial outbuildings (detached garage ~1,221 sf, workshop/building ~1,212 sf, barn ~410 sf, additional structures). The sales grid applies a single "Buildings" line item with very large swings (e.g., Comp 2 "None" gets +$50,000; Comp 1/3 have "Buildings" with -$46,200 and +$8,700 respectively).
- **Problem:** The report does not explain what "Buildings" means in each case (type, size, quality, utility, condition) and how the market reacts to different mixes of accessory improvements. A $50,000 adjustment may be plausible, but without a breakdown it is not auditable.
- **USPAP SR 1-4(a) / SR 2-1 issue:** Large adjustments require stronger explanation and support, not less.

4) Sales History Research – Subject and Comparable Transfers

4A. Subject prior sale – verified but analysis is weak

The subject's prior sale **05/28/2021 for $375,000** is supported by a public listing record. (███████████
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███████████████)

Deficiency: The report does not meaningfully analyze what changed between 05/28/2021 and the 06/05/2023 effective date other than a partial/late list of updates. For a large price swing ($375k to contract $500k), the report should clearly allocate the change among:

- market conditions (time)
- property updates / renovations
- difference between list/contract motivations
- land use changes (fencing/pasture improvements)

4B. Comparable sale histories – report says "no sales within past 12 months," yet comps sold within 12 months of effective date

- Effective date is 06/05/2023. Several cited comps show settlement dates around 09/2022 (within ~9 months). Yet the report contains repeated boilerplate statements such as "no sales of the comparables within the past 12 months." This is internally inconsistent with the grid's own dates and is likely a **copy/paste error** or a misstatement.
- **USPAP SR 2-1(a) "not misleading" concern:** Even if it does not change the numeric value, it undermines credibility and suggests inadequate review/quality control.

5) Adjustment Logic – Consistency, Support, and Replicability

5A. "Age adjustments are not utilized" – questionable for this assignment

- The report states age adjustments are unnecessary because "older homes typically have updates." That can be true sometimes, but a circa-1780 home can still suffer marketability penalties (historic construction, systems, layout, perceived risk) even when updated.
- The appraiser's approach effectively shifts "age" into "condition," but then rates the subject C4 and many comps C3 and applies -$25,000 condition adjustments to C3 comps. That creates a tension: the report both (a) treats the subject as inferior condition (C4), while (b) argues updates reduce effective age enough to justify newer comps.
- **AI / The Appraisal of Real Estate principle:** If the subject is atypical/unique, the burden increases to demonstrate comparable selection and adjustment support. Here, the support is mostly assertion.

5B. GLA adjustments – stated rate vs. applied adjustments (math consistency)

- Report claims **$15/sf above-grade**. Yet examples in the grid do not consistently appear to be simple $15/sf math:
  - Comp 1 GLA difference: 3,200 vs 2,120 (difference 1,080 sf). At $15/sf, the adjustment would be -$16,200, which matches the grid.
  - Comp 2 GLA difference: 3,760 vs 2,120 (difference 1,640 sf). At $15/sf, the adjustment would be -$24,600, which matches the grid.
  - Comp 4 GLA difference: 3,104 vs 2,120 (difference 984 sf). At $15/sf, the adjustment would be -$14,760, which matches the grid.
- **However, comp 3 is problematic:** Comp 3 shows 1,624 sf vs subject 2,120 (difference 496 sf). At $15/sf, that is +$7,440, which appears on the grid, but the comp 3 room count and bed/bath adjustments create an overall pattern where the subject is treated as substantially superior in size/utility despite being historic. The issue is less the math and more whether $15/sf is market-supported for this segment and whether the adjustment is stable across the price/amenity spectrum.
- **Support deficiency:** "Regression market analysis" is cited, but the report provides no regression output, no sensitivity analysis, no explanation of dataset size/filters, and no evidence that $15/sf holds for homes on 5–46 acres with major outbuildings in this rural market.

5C. Site adjustments – very large and only loosely explained

- Comp 2 (5.30 ac) is adjusted **+$100,000** for site; Comp 3 (20.01 ac) **+$50,000**; Comp 1 (46.5 ac) **-$20,000**; Comp 4 (11.96 ac) **+$50,000**.
- The later clarification explains per-acre values ranging from ~$3,700/ac to $10,000/ac and claims the subject is ~$7,500/ac. But the original report does not provide the underlying land sale evidence or extraction logic, making the reader unable to evaluate:

- why 11.96 ac is valued at $100k (~$8,300/ac) while 20 ac is valued at $150k (~$7,500/ac)
- how pastoral vs wooded is quantified
- how river influence, access, and buildability were considered

5D. Buildings/outbuildings adjustments – non-transparent

- "Buildings" adjustments are large (e.g., -$46,200; +$50,000; +$8,700). Yet the report does not describe comparable outbuildings in a way that enables replication (type, size, utility, condition).
- Given the subject's accessory improvements are a major contributor (large shop/garage/barn), lack of transparency here is likely material to value credibility.

6) Comparable Sales – Verification and Apparent Data Issues

6A. Comp 2 – 329█████████████████████

Appraisal reports: Sold $400,000; GLA 3,760; 5.30 ac; 4/4; MLS W████████
Portal verification: ██

Concern: This comp is much newer and substantially larger than the subject. The report compensates with heavy GLA and condition/amenity adjustments, but the question is whether buyers truly view this as a substitute for a historic farmhouse on 20 acres.

6B. Comp 3 – ██████████████████████

Appraisal reports: Sold $455,000; GLA 1,624; 20.01 ac; 3 rooms / 1 br / 1.1 ba reported (this appears suspiciously low for a property widely marketed as a 2 bed / 2.5 bath and much larger total finished area).

Portal / IDX verification: Broker/IDX mirror and Zillow report this property as **2 beds, 2 full + 1 half baths** and **~3,422 sf** (with a split between above/below grade finished area). ██

Material factual discrepancy: The appraisal grid's room/bed/bath and GLA data for Comp 3 appear inconsistent with widely available listing records. If Comp 3 actually has ~3,400 sf finished and 2/2.1 baths, then:
- The appraisal's **GLA adjustment (+$7,440)** is likely incorrect in direction and magnitude.
- The appraisal's **bed/bath adjustments** (and even functional utility comparison) are likely incorrect.
- This could materially change the indicated value and the reconciliation weighting.

USPAP impact: This is the type of issue that can rise to a significant error under SR 1-1(a) and can be misleading under SR 2-1 if not corrected.

6C. Comp 4 – ██████████████████████████

Appraisal reports: Sold $440,000; GLA 3,104; 11.96 ac; 4/2.1; comp is C3 with -$25,000 condition adjustment; "None" for buildings with +$50,000.

IDX mirror verification: A broker IDX mirror reports the property at 11.96 acres but lists **~2,800 sf** (not 3,104). (██

Material concern: If the finished area is closer to 2,800 sf rather than 3,104 sf, then the appraisal's GLA adjustment (-$14,760) may be overstated by roughly 300 sf × $15/sf ≈ $4,500 (order of magnitude). This is not necessarily value-determinative alone, but it is another data integrity hit and contributes to cumulative credibility concerns.

6D. Comp 1 – ██████████████████████

Appraisal reports: Sold $525,000; GLA 3,200; 46.5 ac; 4/3.

Portal red flag: Zillow "recently sold" search results show ████████████████**old for $599,000** and show a larger reported living area (example snippet shows ~4,120 sf). ██████████████████████████████████████
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Material concern: I cannot confirm from the snippet alone the sale date/settlement that matches the appraisal's 02/2023 sale at $525,000. But the portal evidence strongly suggests either:

- the appraisal may have the wrong property or wrong sale transaction, or
- there was another sale, re-sale, or data mismatch (e.g., different "Advantage Ln," incorrect unit, or data provider error).

USPAP impact: If the sale price or GLA is wrong, the entire comp's adjusted indication and its stated weighting ("Comp 1 weighted most heavily") becomes unreliable.

7) Alternative Sales That Could Indicate a Different Value (Required Search)

Important limitation: ██
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7A. A clear "better comp" concept the appraisal should have pursued

Based on substitution and marketability principles, the appraisal should have prioritized at least one or more of the following (even if outside 10 miles):

- Older/historic dwellings (pre-1950 or pre-1900) with acreage and outbuildings.
- Properties with meaningful "farmette" utility (pasture + fencing + barns/workshops), even if smaller GLA.
- Sales closer to the ██████ commuter influence (Winchester fringe) if that is a driver for buyers in this location.

The report instead selected mostly newer, larger houses and attempted to "engineer" comparability with heavy adjustments—this often increases model risk.

7B. Candidate alternatives surfaced during web search (illustrative only)

The web searches surfaced strong evidence that at least some selected comps have misreported characteristics (especially Comp 3 and possibly Comp 1), implying that a re-run of the comp search would almost certainly yield a different set and/or different adjustments.

Practical implication: Correcting Comp 3 to ~3,422 sf finished and 2/2.1 baths ██████████
███

- reduce or reverse the subject's upward GLA adjustment relative to Comp 3,
- reduce the subject's net indicated value from that comp (direction depends on how above/below grade is handled and whether basement finishing is treated properly),
- potentially pull the reconciled value downward if Comp 3 is weighted materially.

Overall Reconciliation Critique (Was $478,000 "adequately supported"?)

The final reconciliation is not adequately supported at the level expected for this property complexity.

- The adjusted comp indications cluster roughly ~$463,700–$488,740 in the report, then reconcile to $478,000; that may appear "reasonable" numerically, but **the cluster depends on at least one comp with likely incorrect fundamental data** (Comp 3 bed/bath and living area). ████████████████████
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- The report provides limited reasoning for weighting beyond "Comp 1 weighted most heavily due to it being the most recent," but Comp 1 itself is not cleanly verified and has portal red flags about price and size. ████████████
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- Large adjustments for land and outbuildings dominate the grid, yet those are precisely the items with the weakest, least replicable support.

Specific "Material Fault" Findings (Checklist Against Your Requested Items)

Category	Finding (Material Fault / Deficiency)	Why it Matters (USPAP / AI)
Comparable factual accuracy	**Comp 3 appears materially mis-described** (appraisal: 1,624 sf; 1 br; 1.1 ba vs listing records showing ~3,422 sf; 2 bed; 2.1 ba). ████████████████████ ████████████	SR 1-1(a), SR 1-4(a), SR 2-1: incorrect comp data can materially skew adjustments and indicated value.
Comparable factual accuracy	**Comp 4 square footage discrepancy** (a███████████ ███████████████████ ████████████	Not necessarily fatal alone, but contributes to cumulative credibility problems and may change GLA adjustments.
Comparable factual accuracy	**Comp 1 portal red flags on sale price/size** (Zillow sold results show $599,000 and larger sf than reported). (███████ ████████████	If Comp 1 is wrong, the report's "most heavily weighted" comp is unreliable.
Market conditions support	1004MC analysis is thin; trends largely asserted due to rural nature; limited replication details for DOM and absorption.	Scope of work must be sufficient for credible results; "rural" does not excuse unsupported conclusions.
Sales history analysis	Prior sale ($375k in 2021) is stated, but analysis of change to 2023 contract is incomplete and internally conflicting.	SR 1-5 / lender forms expectations: prior sale analysis helps detect undue stimulus and supports time/condition narrative.
Adjustments support	Large site and building adjustments not shown with land-sales grid or clear extraction; "regression" claimed without reporting outputs.	AI methodology expects adjustments to be supported and replicable; SR 2-1 requires sufficient info to understand.
Subject condition reporting	Condition narrative conflicts (C4; "bathrooms not updated" vs "new bathroom"; later addendum says condition should be higher).	Condition drives comparable selection and adjustment magnitude; conflicting condition statements can mislead.

Bottom Line Opinion (Unbiased Quality Assessment)

This appraisal contains multiple issues that, in combination, materially weaken reliability of the $478,000 conclusion.

- At least one comparable ████████████████ appears to be mis-entered in a way that could materially affect the value indication. ████████████████████ ████████████████
- Comparable selection relies heavily on newer/larger homes and then uses large adjustments (land/buildings/condition) with limited transparent market support—this is a common source of value bias (either high or low) even when unintentional.
- Internal contradictions (sales history statements; exposure/marketing time; condition/updating) indicate inadequate report editing and quality control, raising concern about workfile rigor.

Result: Even if the "true" market value were near $478,000, the report as written is vulnerable to being deemed **not sufficiently supported / potentially misleading** under USPAP reporting standards, and it likely would not meet a high standard of scrutiny expected for a complex rural acreage property with significant accessory improvements.

Recommended Corrective Actions (What a Competent Re-Work Would Do)

- **Re-verify every comparable** with at least two independent sources (MLS sheet + assessor/record + portal cross-check) and correct bed/bath/GLA/finished basement fields.
- **Replace mismatched comps** with at least one "older/historic" sale with acreage/outbuildings (expand geography/time as needed, clearly disclosed and supported).
- **Provide land-sales support** (grid or summary) and explicitly tie site adjustments to that evidence (pasture vs woods vs river influence, access/build sites).
- **Disaggregate accessory improvement contributions** (detached garage vs shop vs barn) and support adjustments with paired sales, cost-to-contribute, or extraction—do not use a single opaque "Buildings" bucket for large dollars.
- **Resolve condition rating** (C3 vs C4) with clear photo-anchored reasoning; update the narrative so it is internally consistent.
- **Reconcile exposure/marketing time** into one coherent conclusion tied to the competitive set as of 06/05/2023.

Sources (public portal/IDX mirror verification used in this review):

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