



**VIRTUAL/TELECONFERENCE
REAL ESTATE EXAMINING BOARD
Virtual, 4822 Madison Yards Way, Madison
Will Johnson (608) 266-2112
April 13, 2023**

The following agenda describes the issues that the Board plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a record of the actions of the Board.

AGENDA

10:00 A.M.

OPEN SESSION – CALL TO ORDER – ROLL CALL

A. Adoption of Agenda (1-4)

B. Approval of Minutes of February 2, 2023 (5-12)

C. Reminders: Conflicts of Interest, Scheduling Concerns

D. Introductions, Announcements and Recognition

E. Administrative Matters

- 1) Department, Staff and Board Updates
- 2) Board Members – Term Expiration Dates
 - a. Berry, Jeffery K. – 7/1/2026
 - b. Kaleka, Gurmit S. – 7/1/2025
 - c. Lacy, Cathy J – 7/1/2025
 - d. Lauer, Elizabeth A. – 7/1/2022
 - e. Mays, Sonya G. – 7/1/2024
 - f. Pierce, Dennis M. – 7/1/2013
 - g. Richie, Thomas J. – 7/1/2026

F. Legislative and Policy Matters – Discussion and Consideration

G. Disciplinary Trends in Real Estate – Discussion and Consideration

H. Administrative Rules Matters – Discussion and Consideration (13)

- 1) Rule Draft: REEB 12 and 25, Relating to License Renewal and Continuing Education
- 2) Pending or Possible Rulemaking Projects **(14)**

I. Newsletter Matters – Discussion and Consideration

J. Report from the Real Estate Contractual Forms Advisory Council – Discussion and Consideration

- K. Discussion and Consideration of Items Added After Preparation of Agenda:
- 1) Introductions, Announcements and Recognition
 - 2) Administrative Matters
 - 3) Election of Officers
 - 4) Appointment of Liaisons and Alternates
 - 5) Delegation of Authorities
 - 6) Education and Examination Matters
 - 7) Credentialing Matters
 - 8) Practice Matters
 - 9) Legislative and Policy Matters
 - 10) Public Health Emergencies
 - 11) Administrative Rule Matters
 - 12) Liaison Reports
 - 13) Board Liaison Training and Appointment of Mentors
 - 14) Informational Items
 - 15) Division of Legal Services and Compliance (DLSC) Matters
 - 16) Presentations of Petitions for Summary Suspension
 - 17) Petitions for Designation of Hearing Examiner
 - 18) Presentation of Stipulations, Final Decisions and Orders
 - 19) Presentation of Proposed Final Decisions and Orders
 - 20) Presentation of Interim Orders
 - 21) Petitions for Re-Hearing
 - 22) Petitions for Assessments
 - 23) Petitions to Vacate Orders
 - 24) Requests for Disciplinary Proceeding Presentations
 - 25) Motions
 - 26) Petitions
 - 27) Appearances from Requests Received or Renewed
 - 28) Speaking Engagements, Travel, or Public Relation Requests, and Reports

L. Public Comments

CONVENE TO CLOSED SESSION to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85(1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85(1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.).

M. Deliberation on Department of Legal Services and Compliance (DLSC) Matters

- 1) **Proposed Stipulations, Final Decisions and Orders**
 - a. 18 REB 141 – Susan M. Fellows, Peter Ogden, Ogden & Company **(15-24)**
 - b. 20 REB 055 – Steven A. Walczak, Match Realty Group **(25-31)**
 - c. 20 REB 074 – Rodney A. Freymiller **(32-38)**
 - d. 20 REB 122 – Cynthia L. Wollersheim-Tilson **(39-45)**
 - e. 21 REB 019 – Robin J. Fazio, Angelo A. Fazio, Buyers Vantage **(46-52)**
 - f. 21 REB 051 – William R. Webber **(53-60)**
 - g. 21 REB 054 – Thomas L. Simonsen **(61-66)**
 - h. 21 REB 107 – Christopher F. Laes **(67-72)**
 - i. 21 REB 122 – April M. Pirwitz **(73-78)**
 - j. 22 REB 070 – Karen Trentadue, D’Aprile Properties Fontana **(79-85)**

- k. 22 REB 070 – Michael Corey **(86-92)**
- 2) **Administrative Warnings**
 - a. 20 REB 055 – P.L.J. **(93-94)**
 - b. 20 REB 055 – R.J.H. **(95-96)**
 - c. 20 REB 078 – Q.H. **(97-98)**
 - d. 20 REB 078 – R.M.S., H.R. **(99-100)**
 - e. 21 REB 054 – C.R. **(101-103)**
 - f. 22 REB 019 – D.L.C., E.R. **(104-105)**
 - g. 22 REB 107 – B.M.G. **(106-107)**
 - h. 22 REB 124 – C.M.Z. **(108-109)**
 - i. 23 REB 016 – R.C.W., P.R.R.L.D.E.R.H. **(110-111)**
- 3) **Case Closings**
 - a. 20 REB 074 – T.S., T.S.A.R. **(112-116)**
 - b. 20 REB 109 – M.M., G.M. **(117-123)**
 - c. 20 REB 122 – J.B. **(124-127)**
 - d. 22 REB 088 – K.C., A.R.E. **(128-131)**
 - e. 22 REB 120 – O.B. **(132-136)**
 - f. 22 REB 121 – J.R.R., D.M.L., L.M. **(137-141)**
- 4) **Monitoring Matters (142-143)**
 - a. Leonel Cortes – Requesting Full Licensure **(144-156)**
 - b. Amy (Webb) LaCapelle – Requesting Full Licensure **(157-173)**
 - c. Bryan Lam – Requesting Full Licensure **(174-184)**
 - d. Joshua Slaton – Requesting Full Licensure **(185-203)**

N. Deliberation on Proposed Final Decision and Orders

- 1) Courtney K. Kelbel and WI Realty Services – (DHA Case Number SPS-22-0064/DLSC Case Number 18 REB 079) **(204-214)**

O. Deliberation of Items Added After Preparation of the Agenda

- 1) Education and Examination Matters
- 2) Credentialing Matters
- 3) DLSC Matters
- 4) Monitoring Matters
- 5) Professional Assistance Procedure (PAP) Matters
- 6) Petitions for Summary Suspensions
- 7) Petitions for Designation of Hearing Examiner
- 8) Proposed Stipulations, Final Decisions and Order
- 9) Proposed Interim Orders
- 10) Administrative Warnings
- 11) Review of Administrative Warnings
- 12) Proposed Final Decisions and Orders
- 13) Matters Relating to Costs/Orders Fixing Costs
- 14) Case Closings
- 15) Board Liaison Training
- 16) Petitions for Assessments and Evaluations
- 17) Petitions to Vacate Orders
- 18) Remedial Education Cases
- 19) Motions

- 20) Petitions for Re-Hearing
- 21) Appearances from Requests Received or Renewed

P. Consulting with Legal Counsel

RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION

Q. Vote on Items Considered or Deliberated Upon in Closed Session, if Voting is Appropriate

R. Open Session Items Noticed Above Not Completed in the Initial Open Session

ADJOURNMENT

NEXT MEETING: JUNE 15, 2023

MEETINGS AND HEARINGS ARE OPEN TO THE PUBLIC, AND MAY BE CANCELLED WITHOUT NOTICE.

Times listed for meeting items are approximate and depend on the length of discussion and voting. All meetings are held virtually unless otherwise indicated. In-person meetings are typically conducted at 4822 Madison Yards Way, Madison, Wisconsin, unless an alternative location is listed on the meeting notice. In order to confirm a meeting or to request a complete copy of the board's agenda, please visit the Department website at <https://dsps.wi.gov>. The board may also consider materials or items filed after the transmission of this notice. Times listed for the commencement of disciplinary hearings may be changed by the examiner for the convenience of the parties. Requests for interpreters for the hard of hearing, or other accommodations, are considered upon request by contacting the Affirmative Action Officer, or reach the Meeting Staff by calling 608-267-7213.

**VIRTUAL/TELECONFERENCE
REAL ESTATE EXAMINING BOARD
MEETING MINUTES
FEBRUARY 2, 2022**

PRESENT: Gurmit Kaleka, Cathy Lacy, Sonya Mays, Thomas Richie

EXCUSED: Jeffery Berry, Elizabeth Lauer, Dennis Pierce

STAFF: Brad Wojciechowski, Executive Director; Joseph Ricker, Legal Counsel; Dana Denny, Administrative Rule Coordinator; Dialah Azam, Bureau Assistant; and Other Department Staff

CALL TO ORDER

Thomas Richie, Chairperson, called the meeting to order at 10:12 a.m. A quorum was confirmed with four (4) members present.

ADOPTION OF AGENDA

Amendments to the Agenda:

- **OPEN SESSION:** Item N.1) b. **ADD** 21 REB 091
- **OPEN SESSION:** Items N.1) a.; N.2) a.; N.2) c. **CHANGE** from RED to REB

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to adopt the Agenda as amended. Motion carried unanimously.

APPROVAL OF MINUTES OF DECEMBER 8, 2022

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to approve the Minutes of December 8, 2022 as published. Motion carried unanimously.

ADMINISTRATIVE MATTERS

Election of Officers, Appointment of Liaisons and Alternates, Delegation of Authorities

Slate of Officers

NOMINATION: Cathy Lacy nominated the 2022 slate of officers to continue in 2023. All officers accepted their nominations.

Brad Wojciechowski, Executive Director, called for nominations three (3) times.

The Slate of Officers was elected by unanimous voice vote.

ELECTION RESULTS	
Chairperson	Thomas Richie
Vice Chairperson	Elizabeth Lauer
Secretary	Dennis Pierce

Appointment of Liaisons and Alternates

LIAISON APPOINTMENTS	
Credentialing Liaison	Elizabeth Lauer <i>Alternate: Thomas Richie</i>
Education and Examinations Liaison	Cathy Lacy <i>Alternate: Sonya Mays</i>
Monitoring Liaison	Elizabeth Lauer <i>Alternate: Jeffery Berry</i>
Professional Assistance Procedure (PAP) Liaison	Gurmit Kaleka <i>Alternate: Dennis Pierce</i>
Legislative Liaison	Sonya Mays, Thomas Richie
Travel Authorization Liaison	Dennis Pierce <i>Alternate: Elizabeth Lauer</i>
Newsletter Liaison	Sonya Mays, Thomas Richie
Website Liaison(s)	Cathy Lacy <i>Alternate: Gurmit Kaleka</i>
COMMITTEE MEMBER APPOINTMENTS	
Real Estate Contractual Forms Advisory Committee Chairperson	Sonya Mays
Council on Real Estate Curriculum and Examination Representative	Elizabeth Lauer
SCREENING PANEL	
Screening Panel Team 1	Dennis Pierce, Thomas Richie, Jeffery Berry
Screening Panel Team 2	Sonya Mays, Elizabeth Lauer
Screening Panel Team 3	Gurmit Kaleka, Cathy Lacy

Delegation of Authorities

Document Signature Delegations

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to delegate authority to the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to sign documents on behalf of the Board in order to carry out its duties. Motion carried unanimously.

MOTION: Cathy Lacy moved, seconded by Thomas Richie, in order to carry out duties of the Board, the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) has the ability to delegate signature authority for purposes of facilitating the completion of assignments during or between meetings. The members of the Board hereby delegate to the Executive Director or DPD Division Administrator, the authority to sign on behalf of a board member as necessary. Motion carried unanimously.

Delegated Authority for Urgent Matters

MOTION: Cathy Lacy moved, seconded by Sonya Mays, that in order to facilitate the completion of urgent matters between meetings, the Board delegates its authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession), to appoint liaisons to the Department to act in urgent matters. Motion carried unanimously.

Delegation to Chief Legal Counsel Due to Loss of Quorum

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate the review and authority to act on disciplinary cases to the Department's Chief Legal Counsel due to lack of/loss of quorum after two consecutive meetings. Motion carried unanimously.

Delegation to Chief Legal Counsel for Stipulated Resolutions

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to delegate to DSPS Chief Legal Counsel the authority to act on behalf of the Board concerning stipulated resolutions providing for a surrender, suspension, or revocation of a credential, where the underlying merits involve serious and dangerous behavior, and where the signed stipulation is received between Board meetings. The Board further requests that CLC only act on such matters when the best interests of the Board, Department and the Public are best served by acting upon the stipulated resolution at the time the signed stipulation is received versus waiting for the next Board meeting. Motion carried unanimously.

Monitoring Delegations

Delegation of Authorities for Monitoring

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to adopt the “Roles and Authorities Delegated for Monitoring” document as presented in the February 2, 2023 agenda materials on pages 19-21. Motion carried unanimously.

Delegation of Authorities for Legal Counsel to Sign Monitoring Orders

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate to Legal Counsel the authority to sign Monitoring orders that result from Board meetings on behalf of the Board Chairperson. Motion carried unanimously.

Credentialing Authority Delegations

Delegation of Authority to Credentialing Liaison

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to delegate authority to the Credentialing Liaison(s) to serve as a liaison between the Department and the Board and to act on behalf of the Board in regard to credentialing applications or questions presented to them, including the signing of documents related to applications. Motion carried unanimously.

Delegation of Authority to DSPS When Credentialing Criteria is Met

MOTION: Thomas Richie moved, seconded by Cathy Lacy, to delegate credentialing authority to the Department to act upon applications that meet all credentialing statutory and regulatory requirements without Board or Board liaison review. Motion carried unanimously.

Delegation of Authority for Predetermination Reviews

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate authority to the Department Attorneys to make decisions regarding predetermination applications pursuant to Wis. Stat. § 111.335(4)(f). Motion carried unanimously.

Delegation of Authority for Conviction Reviews

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to delegate authority to the Department Attorneys to review and approve applications with convictions which are not substantially related to the practice of real estate. Motion carried unanimously.

Delegation to DSPS When Applicant's Discipline History Has Been Previously Reviewed

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate authority to Department staff to approve applications where Applicant's prior discipline has been approved for a previous real estate credential and there is no new discipline. Motion carried unanimously.

Delegation to DSPS When Applicant's Conviction History Has Been Previously Reviewed

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate authority to Department staff to approve applications where criminal background checks have been approved for a previous real estate credential and there is no new conviction record. Motion carried unanimously.

Delegation of Authority for Military Reciprocity Reviews

MOTION: Sonya Mays moved, seconded by Cathy Lacy, to delegate authority to the Department Attorneys to review and approve military reciprocity applications in which the individual meets the requirements of Wis. Stat. § 440.09. Motion carried unanimously.

Delegated Authority for Application Denial Reviews

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to delegate authority to the Department's Attorney Supervisors to serve as the Board's designee for purposes of reviewing and acting on requests for hearing as a result of a denial of a credential. Motion carried unanimously.

Delegation for Felony Bar Denials to DSPS Attorneys

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate authority to the DSPS attorneys to review and make legal determinations for applications involving a felony conviction, pursuant to Wis. Stat. § 452.25. Motion carried unanimously.

Pre-Screening Delegations

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to delegate to the screening attorney the authority to close cases that do not clearly present a provable violation and cases that do not merit review by the full panel to the screening attorney. Cases that the screening attorney has the authority to close include cases where there is a lack of jurisdiction, where the Board has already taken action on the matter (duplicate case, Board has taken action in regard to the credential holder that addressed the conduct and further action is unnecessary), cases where there is no legal violation of the statutes/regulations, or cases where there is not enough evidence to prove a violation and additional investigation will not yield a different

result. The screening attorney is also delegated the authority to immediately open any case where they believe there is an immediate risk of harm, the materials on their face warrant discipline (such as failure to respond), or cases that have a provable violation that do not need the full panel to determine. Motion carried unanimously.

Voluntary Surrenders

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate authority to the assigned case advisor to accept or refuse a request for voluntary surrender pursuant to Wis. Stat. § 440.19 for a credential holder who has a pending complaint or disciplinary matter. Motion carried unanimously.

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to delegate authority to the Department to accept the voluntary surrender of a credential when there is no pending complaint or disciplinary matter with the Department pursuant to Wis. Stat. § 440.19. Motion carried unanimously.

Education and Examination Liaison(s) Delegation

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate authority to the Education and Examination Liaison(s) to address all issues related to education and examinations. Motion carried unanimously.

Authorization for DSPS to Provide Board Member Contact Information to National Regulatory Related Bodies

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to authorize the Department staff to provide national regulatory related bodies with all board member contact information that the Department retains on file. Motion carried unanimously.

Optional Renewal Notice Insert Delegation

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to designate the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to provide a brief statement or link relating to board-related business within the license renewal notice at the Board's or Board designee's request. Motion carried unanimously.

Legislative Liaison Delegation

MOTION: Sonya Mays moved, seconded by Cathy Lacy, to delegate authority to the Legislative Liaisons to speak on behalf of the Board regarding legislative matters. Motion carried unanimously.

Travel Authorization Liaison Delegation

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to delegate authority to the Travel Authorization Liaison to approve any board member travel to and/or participation in events germane to the board, and to designate representatives from the Board to speak and/or act on the Board's behalf at such events. Motion carried unanimously.

Newsletter Liaison(s) Delegation

MOTION: Sonya Mays moved, seconded by Cathy Lacy, to delegate authority to the newsletter liaison(s) to handle all matters relating to newsletters or digests. Motion carried unanimously.

Website Liaison(s) Delegation

MOTION: Sonya Mays moved, seconded by Cathy Lacy, to authorize to the Website Liaison(s) to act on behalf of the Board in working with Department staff to identify and execute website updates. Motion carried unanimously.

ADMINISTRATIVE RULES MATTERS

REEB 12 and 25, Relating to License Renewal and Continuing Education

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to designate the Chairperson to work with DSPS staff to draft the preliminary rule draft for REEB 12 and 25. Motion carried unanimously.

CLOSED SESSION

MOTION: Thomas Richie moved, seconded by Cathy Lacy, to convene to closed session to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85(1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85(1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.). Thomas Richie, Chairperson, read the language of the motion. The vote of each member was ascertained by voice vote. Roll Call Vote: Gurmit Kaleka-yes; Cathy Lacy -yes; Sonya Mays-yes; and Thomas Richie-yes. Motion carried unanimously.

The Board convened into Closed Session at 11:49 a.m.

DIVISION OF LEGAL SERVICES AND COMPLIANCE (DLSC) MATTERS

Proposed Stipulations, Final Decisions and Orders

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to adopt the Findings of Fact, Conclusions of Law and Order in the matter of disciplinary proceedings of the following cases:

1. 20 REB 072 – Mary Brennan
 2. 20 REB 091 & 21 REB 009 – Tessa Y. Kenney & Alliance Realty Center
 3. 21 REB 072 – Andrew R. Uecker
- Motion carried unanimously.

Case Closings

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to close the following cases for no violation:

1. 20 REB 072 – A.W.P.W., D.S
2. 21 REB 072 – F.C.R.E.M.C., P.S.
3. 22 REB 106 – M.H., P.R.

Motion carried unanimously.

RECONVENE TO OPEN SESSION

MOTION: Cathy Lacy moved, seconded by Thomas Richie, to reconvene into Open Session. Motion carried unanimously.

The Board reconvened into Open Session at 11:58 a.m.

VOTE ON ITEMS CONSIDERED OR DELIBERATED UPON IN CLOSED SESSION, IF VOTING IS APPROPRIATE

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to affirm all motions made and votes taken in Closed Session. Motion carried unanimously.

(Be advised that any recusals or abstentions reflected in the closed session motions stand for the purposes of the affirmation vote.)

ADJOURNMENT

MOTION: Cathy Lacy moved, seconded by Sonya Mays, to adjourn the meeting. Motion carried unanimously.

The meeting adjourned at 12:00 p.m.

**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Dana Denny, Administrative Rules Coordinator		2) Date when request submitted: 3/31/2023 <small>Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting</small>	
3) Name of Board, Committee, Council, Sections: Real Estate Examining Board			
4) Meeting Date: 04/13/2023	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Administrative Rule Matters - Discussion and Consideration 1. Rule Draft: REEB 12 and 25, relating to License Renewal and Education 2. Pending or Possible Rulemaking Projects	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session		8) Is an appearance before the Board being scheduled? <i>(If yes, please complete Appearance Request for Non-DSPS Staff)</i> <input type="checkbox"/> Yes <Appearance Name(s)> <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if applicable: N/A
10) Describe the issue and action that should be addressed: Attachments: <ul style="list-style-type: none"> - Rule Draft: REEB 12 and 25, relating to License Renewal and Education - REEB Rule Project Chart 			
11) Authorization			
<i>Dana Denny</i>		03/31/2023	
Signature of person making this request		Date	
Supervisor (Only required for post agenda deadline items)		Date	
Executive Director signature (Indicates approval for post agenda deadline items)		Date	
Directions for including supporting documents: 1. This form should be saved with any other documents submitted to the Agenda Items folders. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

Real Estate Examining Board

REEB Rule Project Chart (updated 3/31/2023)

Clearinghouse Rule Number	Scope #	Scope Expiration	Code Chapter Affected	Relating clause	Current Step	Next Step
	078-22	03/19/2025	REEB 12 and 25	License Renewal and Continuing Education	Rule Drafting	Posted for EIA comments, submitted to the Clearinghouse, and scheduled for a public hearing.
21-018	097-20	01/27/2023	REEB 12	Predetermination and Broker Requirements	Legislative Review	Rule adoption.