



REAL ESTATE

FALL

2017

NEWS & VIEWS

**LICENSE RENEWALS MUST BE COMPLETED BY
November 15, 2017**

It's that time of year again! It's time for ALL licensees, both active and inactive, to renew their real estate licenses.

Here are some key reminders:

EVERYONE MUST RENEW!

Every license must be renewed each year by November 15th regardless of license status.

RENEW CONVENIENTLY ONLINE!

Start by going to the NDREC home page (realestatend.org) and click on ONLINE LICENSE RENEWALS (it's in the yellow box).

WHAT ARE THE RENEWAL FEES?

Salesperson License renewal fee \$100
Broker and Broker Associate license renewal fee \$120
Firm license renewal fee \$150

DO I NEED ERRORS AND OMISSIONS INSURANCE?

If your license is active you will need to include proof that you have current errors and omissions insurance coverage by providing a certificate of coverage with your renewal. If your license is inactive you do not need to have E&O insurance.

DESIGNATED BROKERS MUST RENEW FIRST!

Renewals for active licensees will not be processed until the designated broker with whom they are affiliated has renewed the firm and his or her license and certified that the licensee has completed the required 9 hours of continuing education prior to renewing.



*Mark Your
Calendar*

RENEWAL DEADLINE IS NOVEMBER 15, 2017

Renewals received after 11/15/17 will be assessed a \$50 late penalty.

Renewals received after 11/30/17 will be assessed a \$100 late penalty.

Renewals received after 12/31/17 be assessed a \$150 late penalty.

Renewals received after 1/31/18 will be assessed a \$200 late penalty.

Renewals received after 2/28/18 will not be accepted and the license will be cancelled in accordance with NDCC §43-23-13.1.

North Dakota Real Estate Commission

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COMMISSION MEETINGS OPEN TO THE PUBLIC

All Commission meetings are open to the public. Commissioners welcome and encourage attendance and observation by any licensee. Location, dates, and times can be found on the Commission's web site www.realestatend.org or on the ND Secretary of State website www.nd.gov/sos/.

Commission News



At their meeting on August 10, 2017 the Commission established a new policy which allows staff to scan and email licenses to brokers so that the licensee can begin working once the broker prints out the emailed license. This will only be able to occur when all paperwork and fees are

paid, but will speed up the receipt of the license so the licensee can begin working without waiting for the license to arrive in the mail. Staff will still mail the original license to the broker who, upon receipt of that license, will replace the emailed license with the printed one.

NDREC Elects Officers for 2017-2018



Diane Louser
Chair



Roger Cymbaluk
Vice Chair

Diane Louser, Minot has officially taken the position as Chair of the Real Estate Commission and Roger Cymbaluk, Williston, will serve as Vice Chair. The two will serve in these leadership positions from July 1, 2017 through June 30, 2018.

Continuing Education Requirements: North Dakota Real Estate Commission vs. Board Requirements

The Commission receives many calls from licensees inquiring about their "ethics training" requirements. The answer to that question is, "The Commission does not have ethics training requirements. Those questions should be asked of your local REALTOR® association/board." All licensees are subject to the license laws in ND Administrative Code 70-02-04-02, which include annual continuing education requirements of 9 hours of approved courses for active licensees. Licensees who choose to be a member of a Board of REALTORS® are subject to the license laws listed above AND ethics training. If you have specific questions about ethics training, please contact your local board.

*****REMINDER*** REALTOR® Code of Ethics** training classes typically do not count as real estate continuing education under the continuing education requirements of the Commission.

Are “Coming Soon” advertisements a violation of real estate license law?

Constance Hoffland
Special Assistant Attorney General
North Dakota Real Estate Commission

Some real estate licensees run “Coming Soon” advertisements on properties, presumably to generate awareness and interest prior to putting the house on the market. The Commission has been asked if these “Coming Soon” advertisements are in accordance with North Dakota real estate license law.

The law in North Dakota does not address “Coming Soon” advertisements specifically. Also, the law does not have a time period, like 24 or 48 hours, within which you must market a property after you have a listing agreement from the seller.

However, the law does require that before you do any marketing or any other services for the seller, you have a signed listing agreement. Specifically, section 70-02-03-04 of the North Dakota Administrative Code requires the licensee “obtain a signed listing agreement in writing from the seller, properly identifying the listed property and containing all the terms and conditions under which the property is to be sold; including the price, the commission to be paid, the signatures of all parties concerned, and definite expiration date prior to the time the property is advertised or offered for sale.”

So, if you place a “Coming Soon” advertisement for a property before actually having the listing agreement in writing and signed, you are violating the law. In other words, it cannot be the listing agreement that is “Coming Soon.”

However, if you have the required listing agreement in writing and fully executed, license law does not prohibit you from advertising that a property is “Coming Soon,” and postpone further marketing of the property. You do want to be sure this is what the client wants and that the agreement with the client does not require immediate marketing. Also, to be sure you are meeting the duties you owe to the client, you should fully inform the client and get their consent before you do a “Coming Soon” advertisement. It is your duty as a licensee to work in the best interests of the client, so before doing a “Coming Soon” advertisement, you should be sure you are doing the “Coming Soon” advertisement for the benefit of the client and that the client agrees to this marketing approach.





**Farewell from
Commissioner Jerry
Youngberg**

It was an honor to serve the people of North Dakota for the past 20 years as a member of the real estate commission, whose purpose is to protect those involved in real estate transactions.

As one of a five-member commission, I was surprised to find that

about 99% of the decisions made were unanimous.

It has been gratifying to see the commission embrace the digital age with much of the work from archiving records to daily transactions being handled digitally. It is not complete but is moving to the point of minimizing the manual handling of documents to working off of a computer screen. One of the major

challenges is to find programs that are affordable for the small number of licensees in North Dakota.

It has been a great education to participate in ARELLO (Association of Real Estate License Law Officials). It has been very beneficial for a small state commission to be able to share and freely exchange concerns, ideas and solutions with larger state commissions with much larger staffs.

Again, it has been a pleasure and honor to serve with the other four commissioners and the staff of the North Dakota Real Estate Commission.

Jerry Youngberg

The Commission wants to take this opportunity to publicly thank Commissioner Youngberg for the many contributions he has made over the years to the Commission, the real estate industry and the public of North Dakota.

Thank you Jerry!



**Welcome new
Commissioner Sandra
Meyer**

Sandra Meyer was recently appointed by Governor Burgum to a five-year term to the Real Estate Commission. The appointment is effective July 1, 2017 and runs through June 30, 2022.

Sandra was born in Williston and lived the first few years of her life on

the family farm in Divide County. Her parents moved to Niagara in the 1950s. She is married to Rod Meyer, who is licensed and co-owner of RE/MAX Grand. They live on the same family farm. Rod and Sandra have four children, three of whom have their real estate license. Nicole and Natalie work in the Minneapolis area and Kimmy works at RE/MAX Grand. Scott previously had his real estate license and is now a mortgage lender.

After getting her real estate license in 1976 and broker's

license in 1978, she managed a rural real estate company called Strout Realty. It specialized in farm sales and sale of farmsteads. There were few women in the real estate industry 40 years ago, so it was suggested that she use the name Sandy or "S. J." The concern was that buyers of farmland may not want to work with a woman. At that time, she was also the Executive Officer of Nelson County Housing Authority where she managed 63 units in seven small towns. In 1987, with four kids keeping her busy, she decided to transfer her license to a Grand Forks brokerage.

Sandra currently possesses the designations of GRI, SFR and CRS. Sandy has been very active with CRS (Certified Residential Specialist). She has had the opportunity to be the President of the Dakotas Chapter twice. Through this organization, she traveled with the Chapter and worked with the national leadership from around the United States.

"Real estate has been good to our family. With the 'new' way of selling through social media, it has been exciting as well as challenging. It is an honor to be appointed by Governor Burgum to the ND Real Estate Commission. I look forward to representing the real estate industry for the next five years."

The other Commissioners and staff welcome Sandra and look forward to her contributions.

Renew your ND real estate license by November 15, 2017.....

Don't put this newsletter away until you mark your calendar with the November 15th deadline to complete your continuing education (ND residents) and submit your 2018 license renewal (all licensees: resident, reciprocal and non-resident.) Your continuing education MUST BE completed prior to renewing your license.

ALL real estate license renewals must be renewed online or postmarked by no later than November 15, 2017 – if not, late fees begin accruing.

Here's a checklist for you:

- ▶ **Your continuing education must be completed by the time you submit your license renewal.**
- ▶ **Your E&O certificate of coverage must be submitted for the year 2018.**
- ▶ **Be sure you have answered all of the questions & included the documents required. – If your renewal is not complete in every way by November 15, 2017, you will be assessed a late fee for every month it remains incomplete.**
- ▶ **Reciprocal & non-resident licensees: You must include a current (less than 30 days old) certificate of licensure with your ND real estate license renewal.**

REMEMBER: Your continuing education must be completed BEFORE you renew your license. Your license renewal MUST be submitted to the Commission office by November 15, 2017.



In Memory

The ND Real Estate Commission extends its sincerest sympathy to the families and friends of the following licensees who have passed away since our last newsletter:

Donald D. Dietrich	Grand Forks, ND	Jerry L. Miller	Grand Forks, ND
Tracy L. Engelhorn	Mandan, ND	Richard A. Nevins	Mandan, ND
Emery C. Fisher	Devils Lake, ND	Richard "Dick" Olson	Bismarck, ND
Robert J. Johnson	Bismarck, ND	James D. Schmidt	Dickinson, ND
Kenneth K. Lang	Bismarck, ND	Lyle J. Steinmetz	Carson, ND

REMINDER TO INACTIVE LICENSEES:

Your inactive license must be renewed annually or it will be automatically cancelled March 1, 2018. This means you must either renew online or complete a 2018 renewal form and pay the appropriate fee by November 15, 2017. Late fees will be assessed after November 15, 2017.

There are no continuing education or Errors and Omissions insurance requirements to renew an inactive license.



REMINDER TO DESIGNATED BROKERS

Designated brokers MUST renew their license and that of their firm BEFORE their broker associates and sales associates can be processed as renewed. This applies to both online and paper renewals.

RENEW ONLINE AT
www.realestatend.org

IMPORTANT Errors and Omissions Insurance Information

ALL RENEWING LICENSEES must submit a Certificate of Coverage for their errors and omissions insurance coverage with their license renewal.

For those with E & O Insurance through RISC:

The errors and omissions insurance premium for 2018 will be \$187.00 (No increase). Go to <https://www.risceo.com/states/north-dakota/> to renew or purchase your E&O online.

If your insurance expires on or before January 1, 2018, and you wish to remain on active status, you must renew your error and omissions insurance and provide proof of insurance for 2018 by November 15, 2017 when you renew your license.

The insurance information packet will NOT be sent from the Commission but WILL BE mailed to all licensees' mailing address directly from Rice Insurance Services (RISC), the Commission's offered plan provider.

As always, you are welcome to use the Commission offered plan or obtain your own equivalent coverage. Just remember that you MUST have errors and omissions insurance coverage to maintain an active real estate license.



Attention
non-resident
and reciprocal
licensees!!

Non-resident & reciprocal licensees must submit a current (less than 30 days old) Certificate of Licensure with their renewal. Your ND license will NOT be renewed until we have received the Certificate of Licensure and proof of E&O insurance.

These may be submitted to our office in several ways:

- Upload with your online renewal
- By mail send to: NDREC PO Box 727,
Bismarck, ND 58502-0727
- Email: ndrealestatecom@midconetwork.com



Disciplinary Actions Taken

The following disciplinary actions have become effective since the last report in the newsletter. A Stipulated Agreement is a settlement agreement between licensees and the Real Estate Commission and constitutes neither an admission nor a denial of any violation.

Tuesday, August 15, 2017

Name	Complaint#	HearingType	Order Date	Violation	Penalty
Bernhardt, Barbara A	2017-04	Stipulated	06/30/2017	Respondent's conduct may have constituted violations of NDCC 43-23-11.1(1)(p) & (w) and ND Administrative Code subsections 70-02-03-02.1 (3), & (4). Respondent may have violated advertising rules by advertising without including and prominently displaying the brokerage trade name on advertisements.	Stipulated to a \$300 fine and payment of \$200 investigative/legal fees both to be paid within 30 days of issuance of order. If not paid within 30 days as ordered Respondent will pay an additional \$300.00.
Harris, Kipp A	2016-07	Stipulated	11/16/2016	Respondent's conduct may have constituted violations of NDCC 43-23-11.1(1)(w), 43-23-08.2, and 43-23-13.1. Respondent is a broker for licensees who failed to produce certificates of completed continuing education credits for 2015 when requested & as required. Respondent noted he was out of the country during the ce audit timeframe and admits that a system to handle the mail promptly was not in place.	Stipulated to a \$300 fine, payment of \$160 investigative/legal fees within 30 days of issuance of order. If payment is not received within 30 days after the date of the Notice of Entry respondent will pay an additional \$300.
Kachuroi, Joseph R	2016-21	Stipulated	11/16/2016	Respondent's conduct may have constituted violations of NDCC 43-23-11.1(1)(p) & (w) and ND Administrative Code subsections 70-02-03-02.1, (2), (3), & (4). Respondent may have violated the rules and regulations based on evidence of failure to prominently display the brokerage name and contact information for the brokerage on advertisements.	Stipulated to a \$300 fine, payment of \$200 investigative/legal fees and submit proof that his advertising has been brought into compliance within 30 days of issuance of order. If payment & proof that advertising is in compliance are not received within 30 days after the date of the Notice of Entry respondent will pay an additional \$300.
Lingenfelter, Lori J	2016-04	Stipulated	03/10/2017	Respondent's conduct may have constituted violations of NDCC 43-23-11.1(1)(p), NDCC 43-23-14.1, and ND Administrative Code section 70-02-01-15. Respondent did not have the trust account records available and open for inspection by the auditors, who are authorized by the Commission to conduct an audit, when the auditors came to the brokerage in November 2015 and did not give the auditors access to the trust account records. Respondent also did not provide the requested records to the auditors when requested to do so in 2016.	Stipulated to a \$300 fine and payment of \$280 investigative/legal fees both to be paid within 30 days of issuance of order. If payment is not received within 30 days after the date of the Notice of Entry of Order, respondent agrees to pay an additional \$300.00.
Schmidt, Bob P	2017-04	Stipulated	06/30/2017	Respondent's conduct may have constituted violations of NDCC 43-23-11.1(1)(p) & (w) and ND Administrative Code subsections 70-02-03-02.1 (3), & (4). Respondent Barbara Bernhardt may have violated advertising rules by advertising without including and prominently displaying the brokerage trade name on advertisements. Respondent Bob P, Schmidt is the broker and is responsible for oversight of licensee advertising.	Stipulated to a \$300 fine and payment of \$200 investigative/legal fees both to be paid within 30 days of issuance of order. If not paid within 30 days as ordered Respondent will pay an additional \$300.00.
Tweten, Laurie K	2016-29	Formal	07/05/2017	Findings of Fact and Conclusions of Law: Respondent violated NDCC 43-23-12.1(1) when she breached her duties of disclosure, reasonable care & diligence, NDCC 43-23-11.1(1)(p) & NDCC 43-23-11.1(1)(w) by not meeting the generally accepted standard of expertise, care or professional ability expected of real estate brokers.	Fine \$750.00 and legal/investigative fees assessed of \$2646.00 to be paid by respondent within 30 days of signed order.

Number of Records: 6

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Minnesota Real Estate Licensee Fined for Referral Kickbacks

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The Minnesota Department of Commerce announced recently that it has imposed a \$5,000 civil penalty on a licensed real estate salesperson and a \$45,000 civil penalty on a title insurance company for an alleged "...kickback scheme in which the agent steered nearly all of his clients to the company in exchange for valuable perks for himself."

The Department alleged that the title insurance company provided the "perks" in violation of the federal Real Estate Settlement Procedures Act (RESPA), which prohibits giving or receiving anything of value in exchange for referrals of settlement services business [lending, real estate brokerage, appraisal, etc.] in a federally related mortgage transaction; and thus also violated applicable Minnesota consumer protection laws.

The Department applied the type of analysis that is often employed by the federal Consumer Financial Protection Bureau (CFPB) in its RESPA anti-kickback enforcement actions. Implementing federal regulations explain that a prohibited "...agreement or understanding for the referral of business incident to or part of a settlement service need not be written or verbalized but may be established by a practice, pattern or course of conduct. When a thing of value is received repeatedly and is connected in any way with the volume or value of the business referred, the receipt of the thing of value is evidence that it is made pursuant to an agreement or understanding for the referral of business" [12 CFR section 1024.14(e)].

According to the investigation, between July 2014 and June 2015 the title company allegedly provided the salesperson with 9 meals, hotel accommodations at a conference in San Francisco, and \$980.00 for a beverage upgrade at a client appreciation event hosted by the salesperson. The salesperson represented buyers and/or sellers in 69 transactions which closed

between January 1, 2013 and December 31, 2015. According to the Department, "None of the 20 transactions in 2013 closed at Liberty Title, eight of the 26 transactions in 2014 closed at the company. In 2015, by contrast, virtually all of the transactions (20 of 23) closed at Liberty Title." From those statistics, the Department's allegations conclude that the salesperson's "...increased rate of client referrals to the [title company]...establish a pattern or practice of conduct by the parties from which a quid pro quo agreement or arrangement for the referral of settlement services existed in violation of the anti-kickback provisions in RESPA." The civil penalties were imposed against the title company and real estate salesperson though separate consent orders that recite the formal allegations the Department was prepared to make, but do not include admissions of guilt.

The Department also noted in its announcement that real estate agents often recommend title insurance and closing services for residential transactions, but it is the client who ultimately pays for them. Commerce Commissioner Mike Rothman said, "These transactions shouldn't be tainted by conflicts of interest that can increase costs for consumers. When a company offers perks and prizes to get referrals from real estate agents, consumers can't trust that their best interests are being served."

The announcement reminds consumers that they have the right to, and should, shop around for title and other settlement services and make sure the company and agent they work with are licensed. And, if an agent makes a specific recommendation, consumers should ask whether there is any business or marketing arrangement with the company being recommended and whether the agent will be compensated by the company.

UPDATE: CFPB Rule Allows Sharing of TRID Closing Disclosure

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The Consumer Financial Protection Bureau (CFPB) recently finalized amendments to its “Know Before You Owe” mortgage disclosure rules, one of which should make it easier for real estate professionals to obtain access to the “new” Closing Disclosure (CD) form.

The CFPB TILA-RESPA Integrated Mortgage Disclosure rules (commonly referred to as “TRID”, but labeled “Know Before You Owe” by the CFPB) took effect in October 2015. The rules replaced the previous disclosure forms required in all “federally-related” residential mortgage transactions, including the once familiar HUD-1 settlement statement, with the CFPB’s mortgage Loan Estimate and Closing Disclosure forms.

When the lengthy and intricate new TRID rules took effect, much attention was focused on the resulting compliance issues and mortgage process disruptions that were experienced by mortgage lenders/ originators, title companies and other transaction service providers. Less publicized was an unintended consequence of the rules that left many real estate licensees with difficulties in obtaining copies of completed Closing Disclosure forms from lenders. The problem arose from lender concerns regarding the privacy provisions of the Graham-Leach-Bliley Act (GLBA) and Regulation P, which restrict lender disclosure of customers’ “nonpublic personal information” (NPI) to third parties. This complication, as well as the nature and contents of the Closing Disclosure form, also prompted some state regulators to address the impact of TRID on real estate license law matters such as recordkeeping and transaction closing statement requirements. (For more information on the development of the TRID forms and rules and their impact on real estate licensing laws, please go to the Arello® Online Resource Archive and enter the search term “TRID”).

The National Association of REALTORS® (NAR) has previously pointed out to the CFPB that, prior to implementation of TRID, real estate agents routinely had access to and used the now-defunct HUD-1

settlement statement to answer client questions about matters such as concessions, escrows, commissions and prorated taxes. NAR has also urged the CFPB to clarify that, under Regulation P, “...it is just as acceptable now as it was before Know Before You Owe for a lender to share the [Closing Disclosure] with third parties”

For its part, the CFPB’s rulemaking proposal issued in July 2016 acknowledged that the Real Estate Settlement Procedures Act (RESPA) and its implementing regulations required settlement agents to issue the HUD-1 form to lenders, borrowers, sellers, and their agents. The CFPB also acknowledged that, in accordance with applicable exceptions to the privacy requirements of the GLBA, it “usual, accepted, and appropriate” for creditors and settlement agents to provide the new Closing Disclosure form to consumers, sellers, and their real estate brokers or other agents. Consequently, the CFPB’s recent final rules incorporate its previous informal guidance on the subject and modify the official TRID commentaries to clarify that a creditor may provide separate disclosure forms to a consumer and seller if state law prohibits sharing information in the disclosure form, as well as in any other situation where the creditor chooses to provide separate disclosures, and establishes the three methods that may be used to make such modifications.

Among numerous other amendments, the final rules also create tolerances for “total of payments” calculations, adjust an exemption mainly affecting housing finance agencies and nonprofits, and extend coverage of the disclosure requirements to cooperative units.

With some exceptions, the rules will take effect 60 days after their publication in the *Federal Register* and become mandatory for transactions in which a creditor or mortgage broker receives an application on or after October 1, 2018.

Beyond Protected Classes: HUD Addresses “Limited English Proficiency” Fair Housing Concerns

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The U.S. Department of Housing and Urban Development, Office of General Counsel, has issued a guidance document warning of potential Fair Housing Act (FHA) liabilities that may arise from unlawful discrimination against persons with “Limited English Proficiency” (LEP).

In an earlier guidance paper examining criminal history-based housing discrimination [May 2016 *Boundaries*], HUD’s Office of General Counsel acknowledged that the existence of a criminal record is not one of the seven protected characteristics under the FHA [i.e., race, color, religion, sex, disability, familial status and national origin] but concluded that certain housing-related practices based on a person’s criminal past may have a unlawful disparate impact on minorities. Similarly, HUD acknowledges in its new LEP guidance that persons with limited ability to read, write, speak, or understand English are not a protected class under the FHA, but may be protected by its prohibitions against discrimination based on

national origin or race.

HUD’s observes that the link between national origin and LEP is “fairly intuitive,” but is also supported by statistics. Over twenty-five million persons in the United States, approximately nine percent of the population, are LEP. Approximately 16,350,000 speak Spanish, 1,660,000 speak Chinese, 850,000 speak Vietnamese, 620,000 speak Korean, 530,000 speak Tagalog, 410,000 speak Russian, and other LEP persons speak dozens of other languages. Citing statistics comparing LEP rates among various segments of the U.S. population, HUD concludes that English language-based housing discrimination generally relates to race or national origin, both of which are FHA-protected classes.

The new HUD guidance examines language-based housing discrimination in the context of both intentional discrimination and practices that have an unlawful discriminatory effect. Intentional discriminatory practices may include, for example,



applying a language-related requirement to people of certain races or nationalities; posting advertisements such as “all tenants must speak English,” or turning away housing applicants, such as potential tenants, who are not fluent in English. HUD also explains that lack of English proficiency is often used as a “proxy” for prohibited race or national origin discrimination, thus courts have held that justifications for language-based discrimination warrant close scrutiny. For example, LEP persons may speak English well enough to conduct essential housing-related matters or have a household member who can provide assistance, “...so a blanket refusal to deal with LEP persons...is likely not motivated by genuine communication concerns.” And, says HUD, if a housing provider or resident can access free or low-cost language assistance services, any cost-based justifications for refusing to deal with LEP persons would also be “immediately suspect.”

FHA liability also can arise from policies or practices that have an unjustified discriminatory effect, or “disparate impact,” on protected classes; even absent any intent to discriminate. HUD notes that, unlike language requirements that have been upheld in some business/employment cases, English proficiency is likely unnecessary in the context of a real estate purchase and sale transaction, for example, because

there is no ongoing relationship between the buyer and seller. HUD adds, “Nor is it likely necessary in the landlord-tenant context where communications are not particularly complex or frequent or where, for example, a landlord employs a management company with multilingual staff or otherwise can access language assistance.” Similarly, says HUD, refusing to allow an LEP borrower to have mortgage documents translated, restricting a mortgage borrower’s use of an interpreter, and requiring that an English speaker cosign a mortgage, are all examples of practices that are unlikely to survive FHA scrutiny.

HUD’s guidance paper also suggests examples of reasonable alternatives to discriminatory LEP practices; such as allowing a reasonable amount of time to take a transaction document to be translated, obtaining written or oral translation services, drawing upon the language skills of a housing provider’s staff members, or agreeing to communicate with an English-speaking family member or other person instead of refusing to deal with a person who does not speak English.

Much of the information in the new HUD guidance document is supported by citations to court decision, census data and other resources that have been omitted here, but are available through the “new LEP guidance” link <https://portal.hud.gov/hudportal/documents/huddoc?id=lepmemo091516.pdf>



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REMEMBER:

Your continuing education must be completed before you submit your license renewal.

Renewals must be submitted to the Commission office by November 15, 2017 or late fees will be assessed.