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Subject: Reg. Z

Comments:

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Unfortunately, many of the people making comments have no idea what effect this rule will have on the marketplace. There are literally thousands of borrowers who have mortgages, who are paying on their mortgages every single month, who will never again qualify based on the new rules in Dodd-Frank. As a hard money lender, I get to hear their stories every day, and it is a shame that they are excluded from getting a regular mortgage and forced to go to a hard money lender, however I appreciate the business. But now even hard money lenders will be forced to prove "ability to repay" and sometimes there just isn't any way to prove it. For example, son inherits and moves into parents home, which is free and clear. Home needs to be renovated in order to put it on the market to sell. Son needs \$20-30k to fix the place up. Son is going to school (or working at a temporary job), or any of hundreds of other logical, rational reasons I hear every day. How can son qualify for even a hard money loan? He can't. The last place a person who doesn't fit into the box, can go, and now that box has been squashed by the federal government. Watch out America, you have no idea what this legislation is going to do to your ability to get a mortgage. We have overreacted now, and we didn't react back in 2004 when we should have raised interest rates, and put a halt to the flood of people walking in the door for free mortgage money. Too late won't fix the problem, it will make it worse, and I am asking that "private money" loans be excluded from all of these rules, so that Americans have at least one option left to them when they are desperate for a solution to their problem.