

From: James M Kilgannon
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Name: James M Kilgannon

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Reg Z: The rules need to explicitly exempt seller financing from the requirements. There are many reasons why a seller or a buyer wouldn't and shouldn't meet many of the requirements. Parents have often done this when selling their homes to their children. Retirees looking for an income stream for their retirement have done this when selling their own homes. Retirees looking for an income stream for their retirement have done this when selling investment properties they own. Small investors who have bought a property and fixed it up have done it when selling. Individuals who have vacation property have done this as well. Executors frequently have done this when selling estate properties. And there are many other examples of this type of sale. Sellers are not financial institutions with the resources to do many of the things which are being required of banks, etc. How many Executors have taken back a mortgage in good faith from an individual based upon their instincts, and little else, that someone would do everything they could to make the payments? How many Sellers have sold their homes to 'give a chance' to someone who was looking for a home for their family, but may have had little or no down payment or a tenuous job? What will this do to organizations like Habitat for Humanity? How many of the people they put into homes would no longer qualify? And would Habitat violate these requirements? Seller financing should be exempted. How many Mom and Pop's buy a house to fix and make a small profit, and find that the only way they can sell it is to take a risk and sell it using Seller Financing? How many people working in the construction industry take their skills and do similar things? Is the intent that the Mom and Pop, or the Carpenter would unknowingly violate the 169 pages of requirements which should only apply to financial institutions? Seller financing should be exempted. According to HUD 40% of non-owner occupied residences are mobile homes which are even more difficult to sell. There are lots of reasons for this beginning with these properties are extremely difficult to find financing for at your local neighborhood bank, and impossible to get financing from at National banks. Is the intent to hold someone having to sell their home with seller financing, into a pool of buyers who are traditionally challenged financially, to the standard banks are expected to be held to, especially when the banks won't lend to someone wishing to buy a mobile home? Seller financing should be exempted. Approximately 5% of homes in US are for sale or for lease. Seller financing is becoming more and more the key to liquidating this inventory. Seller financing is an "age old" tradition based on private property rights, these rules would

virtually eliminate that ability of a private sale. Seller financing should be exempted. Bank loans are not available on some types of properties. In the last few years, I sold a home or two, for less than \$12,000, that I'd fixed up, - and yes, there are nice serviceable homes which can be bought for \$12,000. The problem I had was both that banks didn't want to lend on \$12,000 homes, and that the people who wanted to buy those homes were financially challenged and working their way out of that situation. What did I do? I took a chance. But the rules being proposed would have prevented both me selling the homes, and the people I sold them to able to buy a home. Is that what the intent of the rules is? I very much doubt it. Seller financing should be exempted. In today's challenging real estate market, to take away someone's ability to sell their own properties which they had worked so hard for makes little sense. It will make the foreclosure rates even higher especially for those who are struggling. Responsible seller financing does NOT mean holding sellers to a standard higher than banks. The fact is that most seller financing works and works well. Don't punish buyers and sellers alike because a tiny minority of buyers experience trouble. If you want to deepen the problems in the strained housing market, then sure, take away one of the safety valves, which is seller financing. How many Parents sell a home and take back a mortgage? How many retirees sell a home and take back a mortgage? Is the intent that the Mom and Pop, or the Carpenter, or the individuals who inherit a property, or the gal trying to fix a property up to unknowingly violate the 169 pages of requirements which should only apply to financial institutions? None of these individuals should have to become banks to sell what they worked so hard for. Seller financing should be exempted. Thanks for taking the time to read this.