

From: "Jose Escamilla" <jose@magnoliahomeloans.com> on 04/03/2008 08:30:03 PM

Subject: Regulation Z

To: The Federal Reserve Board
Fax: 202 452-3819 or 202 452-3102

From: Jose Escamilla
Magnolia Home Loans
120 Magnolia Ave.
Oxnard, CA. 93030

Dear Federal reserve Board,

Proposed change to Reg-Z for brokers only to provide a binding written disclosure
In most cases is impossible to disclose the total amount including (YSP) to the borrower because of so many variables, mainly unforeseen underwriting variables that need to be addressed during the transaction, This change makes it makes near impossible to quote a precise amount to the borrower, some times we have to charge less than originally agreed because the borrower has debt that they are asked to pay off or pay down in order to closed the transaction and we have to help the client by reducing our fees, so not having the opportunity to change the fees as may be require will hinder the borrower instead of helping.

The effect this would have on my business is very negative because I would be prevented from actually helping may of my clients.

I honestly don't think this is of benefit to the consumer, please reconsider this change to the Reg-Z

The proposed changes to Reg-Z dictate harsh underwriting guidelines for a new class of higher cost loans, those with APR that exceed comparable treasury yields by a certain margin : 3% above for first mortgages. The proposed triggers are too inclusive and will be subject to many Jumbo, Alt-A Agency Jumbo and FHA loans to this new guidelines, preventing credit worthy borrowers from obtaining financing

Thank you

Sincerely,

Jose Escamilla
Broker