

**From:** "Al Hemann" <al@american-california.com> on 03/27/2008 06:35:03 PM

**Subject:** Regulation Z

Rules committee:

I have no issues with disclosures and have been providing them in writing for the past 27 years. I have issue with your signaling out loan brokers and not the direct lenders or other lenders who do not disclose properly. **We have been disclosing these fees for years!!!**

The changes that need to be made is at Wall Street level and start working down. They wanted every loan anyone could produce and they would price it accordingly. The lenders beat down my door everyday begging for this business. You need to start making new rules with these people first.

- Make the lenders loan officers and all loan officers licensed to do business. Right now anyone can walk into Countrywide, Bank of America, Wells Fargo, Chase, Washington Mutual and any number of institutions and become immediately a "Senior Real Estate Loan Officer". What a joke. My son is 26 and has a Real Estate license and is educated and 4 or 5 of his friends with no education or licensing received this type of position from these lenders...they have no idea what they are doing or saying for that matter. Just bring in the loans is all they have been told.
- Then continuing education...like loan brokers do every 4 years and I think it should be yearly!
- Make the Banks and Savings and loans show what their loan officers are making and what their other loan options are doing like a loan broker does right now. If a bank is doing a "No Cost" loan it needs to be disclosed how much they are making by pricing the loan at a higher rate in order to do this type of loan. **Why do we have to do it and they don't???**
- The lenders need to do their internal audits for all loans not just when they default.
- I could go on forever but these are easy to enforce.

**Summary:**

**You are trying to fix the wrong problem. Bank of America told me at the end of last year that they had 3 times the fraud with in-house agents over brokers. We already disclose our fees and APR's and I listen to the radio and TV adds with most lenders and they do not do this or the do it so small it is misleading the clients.**

**I have done over 12,000 loans in the 30+ years I have been in the loan business and yes there are some bad brokers out there and many bad lenders too but the last time I looked this was a free country and all citizens have rights to free choice. They do not have to do business with brokers they are not being misled in most cases...they just get caught up in the American Way of life. You should be going after the Credit Card industry.**

**I guess if this passes you will also require Insurance Agents, Automobile Salesmen, Attorney's, CPA's and any other business to EXACTLY tell the consumer what they are making on each transaction...**

***I look forward to your comments.***

*Al Hermann*

President

American/California Financial Services, Inc.

*Serving the South Bay Since 1981!*

Office: 310.540.1330 ext 106

Cell: 310.628.0776 24-7!

Fax: 310.765.4991 Personal Fax no cover sheet needed.



CMPS Certified™

[Click here to find out why YOU need a  
Certified Mortgage Planning Specialist](#)

