

**From:** leatherback2@aol.com on 04/01/2008 10:00:07 PM

**Subject:** Regulation Z

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Dear Sir/Madam,

I have been a Mortgage Broker since 1997. This has been my only source of income for the past 13 years, until the current housing market bubble burst.

I respectfully wish to express my opinion in connection to the proposed changes to Reg Z, particularly the part that requires that brokers anticipate prior to submitting an application the fees a person will pay.

As Brokers, we are the liaison between borrowers, lenders, and settlement/escrow agents, which means that anything can change subject to lender's approval, contingencies, third parties such as credit reporting agencies, employer's verification of income, landlords, appraisers, surveyors, etc. Not to mention attorney's, and seller's that may wish to have the terms reconsidered after all third party documentation has been received and verified.

In my experience with borrowers, the information you gather at application can not be verified until after the customer provides documentation that backs up the information they provided during the application. Even when you have put together the most concise loan application, there are always things that come back that does not necessarily match the initial loan application. At the same time, I have yet to see a deal where something did not change due to housing value, re-negotiated purchase prices, or customer's choice of a different mortgage product and program.

I am afraid that the proposed changes will drastically change the way we do business, if we can remain in business at all.

No one really can determine the outcome of any single loan transaction before submitting an application. Many times, even lenders tack on their own changes, or counter offer given new submitted documents that the customers provide right before closing.

The Real Estate and Housing industry is already in shambles. While I do believe in the

need for regulation, and in fair lending, I must also say that no one really holds a crystal ball with borrowers and lenders, this is not an exact science where you can anticipate and predict to a tee what the outcome will be before you even can verify borrower's data. Additionally, there is no real way to determine if the closing fees initially disclosed will remain the same given any changes to the loan amount, purchase price, final appraised value, or borrower's own overall credit, residential, and employment history. All these factors do not come to light at application.

I urge to please re-consider the changes on your proposition. The job we do is not an easy one, but speaking for myself, I strive to do the best possible work within reasonable fees. My goal at the end of each transaction is to have happy educated borrowers who are no longer afraid of the lending system and terminology.

Respectfully yours,

*Karol L. Romero*

*Home Mortgage Consultant*