

**From:** "Edward Willis" <EWillis@breezmaryland.com> on 04/02/2008 03:50:03 PM

**Subject:** Regulation Z

My name is Ed. Willis and I am a mortgage broker in Laurel Maryland. Over the past fifteen years I have been both a broker, a lender and at all times a Real Estate investor. From 2000 through 2007 I was a Regional Manager with Accredited Home Lenders, a nationally know Sub-Prime Lender. After nine years as a lender I have moved back to being a broker so I can help people achieve their financial goals in a more personal manner.

Much of the problems that we are facing today have to do with the hidden ways that there are to make money in this business. If you can not tell your client how much you are making you are charging too much, but why should full disclosure be limited to the broker and not the banks and other types of non-broker lenders?

Yield spread premiums give important flexibility to the borrower and can help the borrower into a better situation when they do not have enough equity to allow them to refinance. Insist on proper disclosure and give yield spreads their own line on the HUD One so that it can not be hidden.

I have seen brokers put people into loans where the borrower had no idea what type of loan that they were getting. Borrowers thinking that they have a 1% rate while all along the loan office has sold them down the river with 3.5% on the back and a rate the borrower would never have taken if they understood.

I have seen borrowers that did not know what Margin and or Index meant much less how they affect them when the initial term of the loan expires. A high margin allows a lender to charge more when an adjustable loan adjusts.

We need to stop the fast food mentality that has overtaken the mortgage industry and apply more financial planning to the transactions.

We must weed out the bad loan officers and not create so many new rules that the honest broker cannot make a living.

Respectfully,

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