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Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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If you're trying to run mortgage brokers out of business and give the consumers LESS options, this will accomplish both. The consumer will ultimately be the victim due to less choices. SOLUTION: As a prior-to-doc loan condition, have the borrowers sign an easy to read form that gives them option of lower rate with higher fees whenever a rebate is being taken. (i.e. the borrower must acknowledge in writing that they had the choice of taking a lower rate, what that rate choice is, and exactly what the increase in closing costs may have been in order to get the lower rate.) This way, the borrower FULLY understands that options for a lower rate were available. The proposed solution with having to maintain separate flat-fee agreements with all lenders will just lead to LAWYERS suing brokers on every transaction.....