

From: Henry Martinez
Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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As if you did not have anything better than to continue to batter and keep beating a dead dog (the Brokers). First, realistically this economic problem was caused by unscrupulous greedy CEO's that want to make everyone believe that the brokers were at fault. Who realistically controlled the funding of these so called pay option ARM loan programs that no longer exist in the market today. The deregulation of the loan industry and leaving it to greedy CEO's who knew exactly what was happening and turned the other way not to jeopardize the loss of their enormous bonuses they were collecting. It was inevitable that the country and the whole world was heading towards a global housing market melt down caused by these individuals who basically got off scot free and were rewarded with financial security. I do support some government intervention to help correct the market failure that was created but not to the point where it interferes with an efficient economical outcome. The majority of the brokers left today are doing an honest job helping their communities and are being singled out. We can not afford additional bureaucracy that will take away the consumers ability of a fair market system where two parties are free to negotiate in good faith. The Federal Reserve Board should take and use the HUD's new GFE which demands that every dollar from all sources be disclosed, and that the broker declare its compensation clearly in a dollar amount. Instead of moving forward with a much more complex system of multi-facted agreements and remedies the board should give the much simpler GFE a chance. The times have changed and the originator today are not steering consumers into time-bomb programs like the ones that were available just a few years ago. The board should place this portion of the proposal rule on hold until the impact of the new Good Faith Estimate is known. Lastly, I request that in its review, the Board reassess the real potential for steering the proposed rule creates, as well as the negative impacts that would follow from enforcement through civil liability...thanks! Henry Martinez