

From: Central Florida Funding Mortgages Unlimitee South, Mark A Gonzalez
Subject: Reg Z - Truth in Lending

Comments:

Date: Dec 07, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
Document ID: R-1366
Document Version: 1
Release Date: 07/23/2009
Name: Mark A Gonzalez
Affiliation:
Category of Affiliation:
Address:
City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

I have worked as a Loan Officer in the Orlando, Florida market for the past 15 years. I understand that due to everything that has happened to the mortgage and banking industry in the past 3 to 4 years and the need to eliminate the unscrupulous mortgage person, the government has to implement some changes to make sure that this will never happen again. But, the proposed amendment to the Regulation Z will only create more costs to an already dying industry, less options for the consumer and will not stop the unscrupulous mortgage broker from taking advantage of the consumer. The number one reason mortgage professionals use Yield Spread Premium (YSP) is to give the consumer a choice on how much closing costs they want to pay. If we had no YSP the consumer would have to pay all our fees and all the normal closing costs of the transaction. With the YSP we can lower our fees and sometimes pay for the consumer's closing costs. I closed a loan last week that we did not charge any closing costs and paid for some of the borrower's closing costs because the borrower only had a certain amount of money available. This scenario will not exist if this proposed amendment passes. The fraudulent and unscrupulous mortgage person will still be able to charge and get the most YSP possible on every loan they close. This proposal does not stop them from defrauding the consumer. The increase in the amount of paperwork to be able to conform with this proposal will increase our costs which will increase the costs that the consumers will have to pay and you will not accomplish anything other than once again increase the consumers closing costs. Can we please have someone with common sense and mortgage industry knowledge help create the proposals? When will actual legitimate mortgage originators have some type of input into our industry's new laws and regulations? Instead of trying to change the laws, we need to help educate the consumer on how to use the existing laws to get the best possible loan. The Annual Percentage Rate (APR) was created and it exist to help consumers get the best loan available in their market. I propose that instead of changing all the existing regulation, that you make it mandatory for

consumers to get three Truths in Lending statements from three different lenders to be able to be approved for a mortgage. With this method the consumer would make sure they are getting the best possible mortgage available to them and it will be their choice who they decided to close with. The unscrupulous mortgage person will never do a loan again if a true borrower had to go thru this process. The legitimate mortgage lender does not have to worry about disclosing the APR because they are already giving the consumer the best mortgage possible. Please stop trying to kill the mortgage professional that still cares about this industry. If you make us move to other industries the consumers will be left with nothing but nurses trying to do a doctors job. Sincerely, Mark Gonzalez Senior Loan Officer Central Florida Funding Mortgages Unlimited South