

From: Tom Smotherman
Subject: Regulation Z -- Truth in Lending

Comments:

Jennifer J. Johnson
Secretary Board of Governors of the Federal Reserve System

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I can't believe the injustice this government has placed upon Real Estate Appraisers (US Citizens) since Andrew Cuomo started this HVCC home loan code.

In America, JQ public has the right to choose their Attorney, their Doctor, their Real Estate Agent, their Lender, Title Co, but apparently not their REAL ESTATE APPRAISER.

I guess my government assumes we are not ethically responsible enough to handle our own business practice. I have been a small business owner for over 25 years and have based

my business plan on good service/ethics/integrity. Most of my appraisal business was based on referral. Due to HVCC there are no more referrals for me as the government has taken rights from JQ public's to choose.

This regulation has driven many appraisers out of the business and has caused heavy financial losses to the rest of us. By the regulations wedging these AMC's between appraisers and lenders has

caused more harm than good, not for just the appraisal industry and lenders, but the general public at large, which these foolish regulations were suppose to protect. That' s the government for you.

Since WE appraisers have no collective bargaining, our wages are market driven and basically have been very slow to increase. Even as the housing market was climbing by 20% per year and Real Estate agents

were making higher and higher fees/income, the appraisal fee was steady for years at approx \$300-\$350 for a typical conv. Appraisal. FHA/VA were slightly higher \$400+-.

Currently VA's fee's are set at \$450 which is the benchmark for my business. I fear these AMC's are predatory and have leverage on all appraisers and the general public.

All AMC's discount the appraisers (WHATS REASONABLE AND CUSTOMARY FEE) for their services at 25-35%, so there profiting 25-35% right there. AMC's then charge the client in escrow (JQ Public) 20-35% over the combined fee and get another 20-35% more from them. I have seen this and have documentation.

The appraiser gets 25-35% less for their services and the public now has to pay

20-35% more for their appraisal at closing. what a scam.... and AMC's there not even regulated....

This is not the American Way

Senior Appraiser 28 years FHA/VA approved