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I just don't understand why our elective representatives, Fannie Mae, etc. are even considering the continuation of this outrageous forced 3rd party system (AMCs) that began with implementation of HVCC. With the overwhelming evidence of fraud and corruption within the banking system in the last few years, I don't understand why there is such a appraiser and mortgage broker witch hunt.

Don't get me wrong, there was plenty of fraud and corruption within the appraisal and mortgage industry, but per my research, the mortgage broker/appraiser loan origination sector was only a small percentage of the total fraudulent loans the banks processed and sold. The appraisers now, and due to other pending regulations, the mortgage brokers and R.E. agents, are at risk of destruction due to over-regulation. Regulations that create price fixing on appraisal fees, broker commissions, etc., limits free market enterprise, and an American citizen's right to run a small business. Doesn't America prides itself on the "free market" ideal. These regulations are unconstitutional and go against our whole ideal of a "free market". In regard to the appraisal industry, having a 3rd party, for so called "appraiser independence" is really a joke.

Has everyone forgotten why HVCC was implemented? Lawsuits, lawsuits, and more lawsuits. There were and still are, many lawsuits for fraud and corruption between banks and AMCs. Does anyone remember, the wonderful Mr. Cuomo, NY Attorney General, who has financial interests with AMCs? He made a back room deal with Fannie Mae, "I won't pursue all of your fraud and corrupt actions if you come up with new regulations that will promote appraiser independence, because we all know that the appraiser/ broker relationships are solely responsible for the this whole housing mess and the banks, just the poor victims of these relationships. Hummm..... surprise!! A deal was struck - FORCE a 3rd party entity (let's use the AMC system, so Mr. Cuomo can make more money). An entity that will be a firewall between the

appraiser and the loan originators; HVCC. As a result of HVCC, banks lost their appraisal departments and all the income it provided for them. However, they have made up for most of it, by owning most of the AMCs. (Yes, a violation of HVCC - a conflict of interest, but is being ignored by everyone in Washington. At the same time, most appraisers lost their established business clients, have been FORCED to do business with AMCs exclusively for federal loan transactions, have lost 50%-70% of their income due to the sick AMC system which seeks only the cheapest product for maximum profit gains, have lost a large sector of their market share for solicitation of their services, have lost the income to support their families, the ability to hire trainees and office staff, and have lost their right to run a small business, where fees/prices are based on business expenses, the type of service required, and the amount of time it takes to provide the service. Again, with the overwhelming evidence of internal bank fraud and corruption, how can anyone vote for regulations that will lead to the death of the mortgage and the appraisal industries? These industries employ thousands of Americans that provide valuable services to the real estate loan industry, but because the banks have established themselves as "victims" rather than the "real cause" of the current financial crisis, a witch hunt of mortgage brokers and appraisers was begun. We all know that the big banks are in monopoly mode, a game that includes cutting out the mortgage industry from the loan industry, and gaining control of the appraisal industry. This is evident in the Frank-Dodd Act, there is actually a regulation that allows banks the ability to hire their own appraisal staffs again, but at the same time, forbids mortgage brokers from talking to an appraiser and banishes them from the appraisal ordering process. This is insane! Have the banks proven themselves to be more honest than mortgage brokers, more honest than appraisers?? The answer is no, the courts are STILL pursuing charges against bank fraud and corruption. It is a double standard that only brings more profits to the banks and more destruction of the mortgage and appraisal industries. Are the connections/influences of the big banks/AMCs and our elected representatives really so strong to allow this happen to the "PEOPLE"? Please stop this! Implementing "customary and reasonable fees" is a just a small band aid for bad regulations, and a sick AMC system that will prove to hamper the real estate recovery and jeopardize the future of the appraisal and mortgage industries. EVERYONE must understand that "VALUE" influence on appraisers can never be stopped by regulations. Does everyone in Washington really think the AMCs are not competing for business and influencing appraisers for needed values? Think out side the box, if AMCs provide appraisals that are not "hitting values", the AMCs start losing clients and income. Please interview appraiser in your area. They will tell you, AMCs do not say the words "the value is too low or high", but through their "suggestions" and "so called" needed corrections, imply that the appraiser's concluded value is not what is needed. If an appraiser does not comply with the AMC's "suggestions" which include many times, violations of USPAP, they are removed from the AMC appraiser list. (big loss of income for the appraiser) Over-regulation of the mortgage and appraisal industry is not the answer. The answer is, the removal of the mandatory AMC system for the constitutional rights of mortgage brokers and appraisers, implement over-sight agencies, establish strict new laws with drastic repercussions for acts of fraud/corruption/misconduct and most of all include a "safe" agency, where appraisers, R. E. agents, brokers, banks, etc. can report fraud and corruption without the fear of retaliation from the reported party. It appears the Frank-Dodd Act has established some agencies to report appraiser misconduct, but has not put much thought to the idea of including appraisers, so they can report fraud and misconduct of the mortgage brokers, AMCs and banks. The agency must be a "safe" avenue, especially for appraisers, if not,

most appraisers will not make reports. The reason for this is , if a appraiser's "reporting of misconduct" gets back to the AMCs, all appraisers know, it will result in the banishment of the appraiser from the AMC that has been reported, and most likely other AMCs. The Nazi style control the AMCs have over appraisers is the worst thing that has come out of HVCC. AMCs have control of the appraiser's volume of work and the amount of income they can make. They can make or break an appraiser with a simple computer key stroke. With the FORCED AMC system, appraiser are daily, put in a position to choose between

feeding their family or playing the AMC game. We all know this should not happen, not in America, but it is happening and it needs to be stopped. I beg all elected representatives writing these new regulations, to ignore the big bank and AMC system influences on this Act. They are out for themselves and are motivated by money. They are out to "steal" more and more money from the American consumer, the mortgage brokers and the appraisers to achieve their goals. Isn't time for Washington to stop bending over backwards to help the banking industry, and concentrate on the needs of the American consumer and the industries that support the loan industry. There are other ways to illustrate to the world that it is safe to invest in American real estate again. Please focus on changing the laws and establishing agencies vs over-regulation Stop the banks from raping mortgage brokers and appraisers. I use the term "rape", because this is what they are doing and will continue to do, if not stopped by Washington.