

From: Gary M Brink
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Comments:

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Name: Gary M Brink

Comments:

Hello, am reviewing a commentary submission by my local REIA as follows: The Federal Reserve, which received sweeping new authority under the Obama regulatory reauthorization, wants to effectively eliminate seller-held (a.k.a. purchase money) mortgages. It will do this by enacting a rule for the Dodd-Frank Act prohibiting property sellers from taking back a mortgage unless the buyer essentially can qualify for conventional financing! What's more, Ma and Pa Homeowner, who create 95% of seller-held mortgages, won't be able to qualify buyers under the same underwriting standards that banks are required to perform, and therefore the cash flow notes won't be created. If this is enacted it also will remove access to housing for millions of Americans, because seller "financing" is the only way people who can't qualify for conventional loans can buy a house. Moreover, it would allow a buyer a three year right of rescission (they can cancel the sale) if the seller did not properly qualify them. The right of rescission also applies to anyone who buys the note. We have precious little time to try to stop this. Note: Am assuming the authority of the Federal Reserve as an entity is applying such regulations to lenders drawing funds directly from the reserve, and that such limitations will not apply to private contracts, private monetary transactional contracts between individuals, and that such regs were put in place because the structure of real estate contracts somehow was abused at some time in the past by organized institutions who in their irresponsibility has made said contracts without due diligence on their part, so such pre-recommended boundaries of pre-approval has become a standard of which can be protected by regulation, realizing that most non-institutional transactions operating under the honor system still have valid contracts to this day without such limitations. Reality, the boundaries has just allowed predatory responses to non-pay which usually causes the said contractee to become non-asciative with the lender, causing a furious breach of contract, whereas in most private lending, honor standardized, these breaches are rare. It would seem that the reality of today's mortgage problems were created by interbank transactions of contracts which always lead to a bankrupted holder at the tail of any falling market and that this has been known since the beginning of time, and that somehow the public is being forced to play actions to make it seem that the consumer is at fault, when in reality the governmental systems of monitored transactions could no longer predict its investment formulas and in an organized manner deemed the market sour, thus forcing an irrecoverable market, which in turn caused a rejection of notes to the last transactional holder. Reality, the end consumer than by news and market, than became guilty of breach of contract. Reality, the entire credit

approval system is what breaches market production, and that although known losses occur the banks backed by the federal reserve could have applied a valuation adjustment and kept all mortgages valid, thus holding more than what it has now, and although this solve would have become a predicatable function of market, it would sub save it every time, but at the same timne create a valuation function that would somehow need to to calculated in economic market functions for the future, and slowly re-developed, as crashing never solves anything, and regulating the consumer in federal terms, when in reality it is a known repeating transactional function of institutionalized lenders. All we ask as businesses that succeed in all markets, that any regulation be applied carefully (such regulation is recommeded or applied to institutionalized lenders, and have no effect on any private contractual transactions and that any applied regs be carefully considered as to not crash the successful markets contributing to recovery in real time markets. Basically be very careful with law, so it applies to the intended, and does not create any present market re-organaztion that creates market failure in the private market that is flourishing presently.... although institutionally counter competitive, it does not have the problems or needs any new laws to breach its ability to transact at this time, and that such success need to be noted and respected, as it is carrying the recovery at this time....Thanks for taking the time.. Gary