From:D. D. CoatsProposal:1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment StandardsSubject:Reg. Z

Comments:

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## Comments:

Homeowners and small house investors can not be expected to understand and comply with hundreds of pages of regulations which mortgage lending attorneys can not even understand. Investors and home owners can not be held liable to gualify the credit worthiness of their buyers. Even FANNIE and FREDDIE have proven that they can't always gualify their lending risks. To regulate a provision that would allow a home buyer/borrower three years to effectively get a refund on all payments on an owner finance mortgage because the seller did not comply with some misunderstood regulation, will have the effect of prohibiting all owner financing! Buyers would simply buy and then sue within three years to get all of their money back. Would you take that risk? Of course not. So these types of mis-informed regulations will absolutely shut down owner financing. You need to understand that owner financing did not cause our national bankruptcy. Banks and wall street did. But if you stop owner financing, you will absolutely shut down the 40-50% of the housing market that still functions. That will cause a widespread loss of jobs in housing and all related business, and increase unempolyment back to double digits. You will hurt a lot of innocent people very very badly