From:Fred RossiterSubject:Regulation Z -- Truth in Lending

Comments:

Good Afternoon,

The Huffington Post's lead headline this afternoon (5/16/2011) reads: Confidential Federal Audits Accuse Five Biggest Mortgage Firms Of Defrauding Taxpayers. Please read the story at: http://ww w. huffingtonpost.com/2011/05/16/foreclosure-fraud-audit-false-claims-act_n_862686. html.

The Federal Reserve allows each of these 5 crooked banks to run their own Fee Panels of "approved" appraisers through their respective lender owned and operated AMC's. Is this not the clearest case yet of "the fox guarding the hen house"? How much more embarrassment will it take for the Federal Reserve to completely sever the link between lenders and appraisers? How many more trillions of dollars must be lost? How much more confidence in the Federal Reserve and these banks must be lost before you "get out of the same bed" with these lenders?

The solution is change the appraiser's client (and their fiduciary) from the lender to: Fannie Mae, Freddie Mac, the FHA, or the VA. All appraisers should owe their fiduciary to these federal agencies ... not the lenders. Each of these entities could set up their own on line portal thru which all appraisals are ordered, delivered, reviewed and paid for. It's real simple because all these AMC's use on line portals for their business.

Respectfully, Capt. Fred Rossiter