



HomeAid
Los Angeles/Ventura

Building dignified housing where homeless families and individuals can rebuild their lives.



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March 28, 2011

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Alfred M. Pollard, Esq.
General Counsel
Federal Housing Finance Agency
Fourth Floor
1700 G Street NW
Washington, D.C. 20552

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Secretary

Attention: Public Comments **Re:** Regulatory Identification Number ("RIN") 2590-AA41

Exemption Allowing the Processing of Transfer Fees by Regulated Entities for Charitable Purposes

Minda Johnstone

Treasurer

Dear Mr. Pollard:

Lorraine Alderette
LL Development Partners
Director

The following comments are submitted to the Federal Housing Finance Agency ("FHFA") pursuant to the now proposed regulation to restrict from transacting in encumbered properties those "regulated agencies" as outlined in the "Notice of Proposed Rulemaking", 12 CFR Part 1228, RIN 2590-AA41.

Tim Bearer
Daily Newa
Director

De minimis transfer fees neither affect the liquidity of the housing nor housing finance markets: Contrary to the argument as purported therein, nominal or de minimis transfer fees, as is the case of Lennar Charitable Housing Foundation's ("LCHF") 0.05% encumbrance (e.g. \$75.00 on a \$150,000 home) does NOT adversely effect materially the liquidity of the housing market and further said obligation is subordinate to lenders first rights and thus does NOT adversely affect materially the housing finance market, or specifically the ability of creditors to recoup assets in instances in which foreclosure is sought. FHFA should exempt from its Rule private transfer fees which are below a certain percentage or dollar amount.

David Goldberg
Focus Marketing Services
Director

Transfer Fees in accordance with state legislation: LCHF complies with California Civil Code Section 1098.5 which requires full disclosure to all parties privy to the payment of all transfer fees associated with the encumbered asset.

Joseph Lynch
JTL Development
Director

Payments are used to support charities adjacent to encumbered properties: LCHF utilizes payments received via transfer fees to support charities that are within the general community and considered to be adjacent or contiguous to encumbered properties, taking into consideration, amongst other things, the potential lack of credible services in the aforementioned areas.

Neil McAuliffe
McAuliffe Financial Services
Inc.
Director

Many thousands of homeless persons will suffer should FHFA restrict regulated agencies from dealing in encumbered transactions: HomeAid Los Angeles Ventura, as a beneficiary of charitable donations that originate from transfer fees, stands to suffer greatly from the potential loss of invaluable support that such "rulemaking" might have. LCHF alone has benevolently helped HomeAid provide some twenty plus shelter programs and over three hundred beds for the transitionally homeless in Los Angeles and Ventura County.

Erik Pfahler
Shapell Homes
Director

In summation, we support solely the responsible use of transfer fees to better surrounding communities in a charitable manner consistent with that as described above.

Holly Schroeder
Building Industry Association
Greater Los Angeles/Ventura
Director

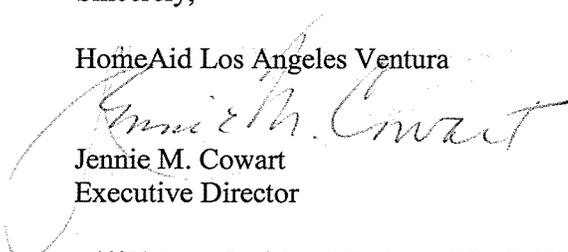
Sandra Stewart, Esq.
Cox, Castle & Nicholson, LLP
Director

Tom Weston
Weston | Mason
Director

Sincerely,

EXECUTIVE DIRECTOR
Jennie Meredith-Cowart

HomeAid Los Angeles Ventura


Jennie M. Cowart
Executive Director

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