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Subject: Reg Z - (Credit Transactions)

Comments:

Date: Dec 28, 2010

Proposal: Regulation Z - Truth in Lending Act
Document ID: R-1399
Document Version: 1
Release Date: 12/13/2010
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Years ago, the HVCC was adopted, without consideration from the very industry it would negatively affect. The HVCC code of conduct was the arbitrary result of a legal settlement with the attorney general of New York, as the arbitrator and FNMA and FHLMC regarding Washington Mutual and their AMC. It was applied nationwide within weeks of that closed door meeting. And it should be considered a case study in the value of the legislative process: If the HVCC had been a bill introduced into Congress, it would have never passed without having undergone drastic changes. But it wasn't a bill and it isn't a law; it's a legal settlement by one state's attorney general, imposed on all 50 states.
Every public policy has unintended consequences. But that doesn't mean that the consequences are unforeseen. Plenty of people foresaw the unintended consequences arising from the HVCC. Because it didn't go through a legislative committee system, because it wasn't passed by two houses, and because it wasn't signed by a governor or president, those foreseeable but unintended consequences could be - and were - ignored. As a matter of fact Mr. Cuomo was a paid board member of AMCO, an appraisal management company. His buddy is Ed Davidson (a major campaign contributor of Cuomo) and was the CEO of AMCO, which was sold to SIRVA and renamed Valuation Services, LLC. It is reported that Davison has rights to future income from Valuation Services, LLC. (and I wouldn't be surprised if Cuomo does get a couple of bucks from it either, but that's pure conjecture on my part.) HVCC was supposed to include Independent Valuation Protection Institute, which is a place to report fraud and coercion.
That was never funded so AMCs are still unregulated in the strictest sense. It was rumored that Ed Davidson was to head the IVPI. As it stands, HVCC was nothing but a profit center for the big banks who own them. The fact that FNMA and FHLMC has adopted HVCC and mandates it in their guidelines is unconscionable and creates unwarranted compromise with the banks in the long run. Now we have the Dodd Frank Act. Mr. Frank was proven "a player" at FNMA (his partner worked at FNMA) and he is making law regarding the appraisal industry. He should have recused himself from taking part in the law's formation. The Dodd Frank Act is "An Act to promote the financial stability of

the United States by improving accountability and transparency in the financial system, to end "too big to fail", to protect the American taxpayer by ending bailouts, to protect consumers from abusive financial services practices, and for other purposes." The appraisal industry is just one other pawn for the big banks to collect revenues for those banks in the name of justice. What really happens is those banks control the appraisal industry by mandating the way the appraisers are compensated, how the appraisals are "farmed out", how the appraisal industry is controlled by the very abusers of that industry.

And it has the full approval of the President of the United States. And to add salt to that wound, it is backed by the President Obama.