

From: [Lori McElligott](#)
To: [#FHFA.REG-COMMENTS](#)
Subject: [EXT] PACE Request for Input, Notice No. 2020-N-1
Date: Tuesday, January 28, 2020 8:07:03 PM
Attachments: [image002.png](#)

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Good Afternoon,

I, as a Credit Union Professional that specializes in mortgages oppose the PACE program and priority liens that would put lenders in jeopardy of non-collection in the event of foreclosures. Lenders have limits in place and prudent underwriting practices that they make to offer loans. The PACE loans put our lien position being a priority at risk with a loan that could be gotten by other means, and that may be more beneficial in rate and terms to the homeowner/borrower.

Home equity loans and/or a refinance of their current mortgage may be more beneficial to our members. It is not right to jeopardize a current lien holders collateral position by putting a lien position in front of their mortgage that was not divulged in the underwriting process. I hope this will be re-considered.

Thank you



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