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OFFICE OF GENERAL COUNSEL

September 20, 2010

Alfred M. Pollard, Esq.
General Council, Federal Housing Finance Agency
Fourth Floor
1700 G Street NW
Washington, DC 20552
Attention: Public Comments

Subject: **OPPOSE BAN ON TRANSFER FEES USED FOR CHARITITABLE PURPOSES**

Dear Mr. Pollard:

Banning transfer fees for charitable purposes will cut funding to thousands of homeless individuals:
Community Resource Center, as a beneficiary of charitable donations that originate from transfer fees,
stands to suffer greatly from the loss of invaluable support that such a ban would place. Such benevolent
contributors in this manner have helped Community Resource Center provide:
   o   1 Shelter;
   o   24 Beds; and
   o   26,280 Meals.

The transfer fee is nominal and non-intrusive: The fees borne by the parties privy to the transaction
truly are de minimis in amount, and especially so as compared to the value of the asset being transferred.
Furthermore, said parties continue to show support for the end usage of fees collected when allocated for
charitable causes.

We supports solely the use of transfer fees to better surrounding communities: Creating
exclusionary language allowing non-profits the opportunity to continue to benefit from this unique source
of revenue does not benefit solely non-profits and their beneficiaries but as well legislators and further the
local communities as a whole.

No hidden fees, no hidden agenda:
California Civil Code Section 1098.5 requires full disclosure to those responsible for payment all transfer
fees associated with the encumbered asset (property). As well, charities continue to provide the utmost
transparency and ensure that the funds collected are used in a manner that behooves the public's interest
(as deemed so by the IRS and other external auditors).

**Bottom line: Over 7,500 persons annually have their lives changed by Community Resource Center,
in one form or another, resulting from the support of organizations benefiting from transfer fees.**

Best Regards,

Laurin Pause
Executive Director