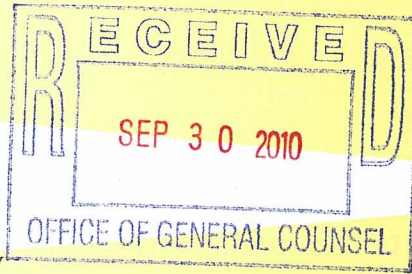


September 23, 2010

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 CHARITABLE PURPOSES**

Dear Mr. Pollard:

Banning transfer fees for charitable purposes will cut funding to thousands of homeless individuals: The Orange County Rescue Mission, Inc., 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. This past fiscal year, such benevolent contributors in this manner have helped the Orange County Rescue Mission provide:

- 7 Shelters;
- 127,400 Bed nights; and
- 1,076,814 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 1,000 persons have had their lives changed by the Orange County Rescues Mission this past fiscal year, in one form or another, resulting from the support of organizations benefiting from transfer fees.

Best Regards,

Jim Palmer, President
Orange County Rescue Mission