



September 24, 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 children and former foster youth. As a beneficiary of charitable donations that originate from transfer fees, Casa de Amparo's clients stand to suffer greatly from the loss of invaluable support that such a ban would cause. During our last fiscal year, such benevolent contributions helped us to provide:

- 10,784 Nights of Shelter;
- 48 Beds; and
- 40,949 Meals

The transfer fee is nominal and non-intrusive: The fees borne by the parties to the transaction truly are minimal in amount, and especially so when compared to the value of what is accomplished with the asset being transferred. Furthermore, the involved parties continue to show long term support for the service outcomes achieved when the fees are allocated for charitable causes like those provided to young people by Casa de Amparo.

We support 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 benefits non-profits and our needy clients and also 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 of transfer fees associated with the encumbered asset (property). In addition, 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: One thousand children, youth and their parents have their lives changed each year by Casa de Amparo as a result of transfer fees.

Best Regards,

Sharon Delphenich, LCSW
Executive Director