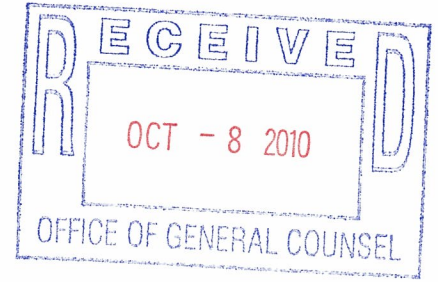




September 29, 2010



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

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Executive Director
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Programs
Homeless Prevention Program
Mercy House Centers
Rapid Re-Housing
Temporary Homeless Service Area
Assisi House
Emmanuel House
Joseph House
Regina House
Trinity House
Aftercare Services
Damien Residence
Frances Xavier Residence
Guadalupe Residence
Katharine Drexel Residence
San Miguel Residence

Tax ID
33-0315864

Dear Mr. Pollard:

Banning transfer fees for charitable purposes will cut funding to thousands of homeless individuals: Mercy House Living Centers, 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 have helped Mercy House Living Centers with the pre-development of its newest Home Aid Orange County project, Frances Xavier Residence. This project is impactful as it will provide 12 units of greatly needed affordable, permanent housing to formerly homeless individuals and families.

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 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 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).

During fiscal year 2008-2009, 9,048 individuals had their lives changed by Mercy House Living Centers. Frances Xavier Residence will add to this number and serve generations of homeless and at risk families and effectively break the cycle of homelessness for those served. Ours and other non-profit agencies benefit tremendously from the support of organizations benefiting from transfer fees. The impact to countless numbers of homeless and those at risk of homeless should not be underestimated.

Best Regards,

Lawrence G. Haynes, Jr.
Executive Director

We help people find their way back home.