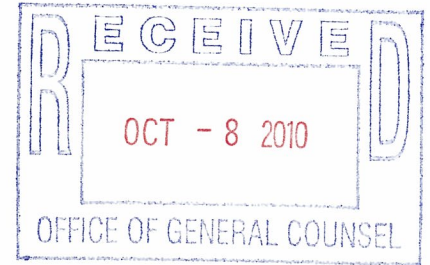




HomeAid

September 30, 2010

Alfred M. Pollard, Esq.  
General Council, Federal Housing Finance Agency  
1700 G Street NW - Fourth Floor  
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 across Southern California.** Both HomeAid Inland Empire and HomeAid Orange County benefited from charitable donations that originated from transfer fees and we stand to suffer greatly from the loss of invaluable support that such a ban would take place.

Such benevolent contributors in this manner have helped HomeAid since 2002 and in Orange County that translates into 11 housing developments that added 358 beds and in the Inland Empire 9 housing developments that added 227 beds for homeless men, women and children.

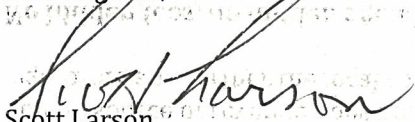
**The transfer fee is nominal and non-intrusive:** The fees borne by the parties privy to the transaction truly are a minimal amount and especially so as compared to the value of the asset being transferred. Furthermore, said parties continue to show support for the end usage of fees collected when allocated 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 behoves the public's interest (as deemed so by the IRS and other external auditors).

Over 4,000 persons have had their lives changed over the past eight years by HomeAid in Inland Empire and Orange County, in one form or another, resulting from the support of organizations benefiting from transfer fees.

Best Regards,

  
Scott Larson  
Executive Director, HomeAid Orange County  
Managing Director, HomeAid Inland Empire