



Residential Shelter

24-hour Crisis Line

Local and Out of County 951.683.0829 Remainder of Riverside County 800.339.SAFE

www.alternativestodv.org

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Tax ID #95-3212844

October 6, 2010

Alfred M. Pollard, Esq. General Counsel, Federal Housing Finance Agency Fourth Floor 1700 G. Street NW Washington, D.C 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: Alternatives to Domestic Violence, as a beneficiary of charitable donations that originate from transfer fees, stands to suffer greatly from loss of invaluable support that such a ban would place. Such benevolent contributions in this manner have helped Alternatives to Domestic Violence provide 60 beds for women and children, a Child Development for pre-school children and Training Center for women at its residential Shelter. This translates into an annual number of 6,348-bed nights and 12,771 served meals.

OFFICE OF GENERAL COUNSEL

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 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 599 persons have had their lives changed by Alternatives to Domestic Violence, in one form or another, resulting from the support of organizations benefiting from transfer fees.

Best Regards.

Eliza Daniely Woolfolk Chief Executive Officer

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