



HomeVestors
TD Properties Unlimited, Inc.

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INDEPENDENT REGULATORY
REVIEW COMMISSION

August 16, 2007

Pennsylvania Department of Banking
Attn: Office of Chief Counsel
17 North Second Street · Suite 1300
Harrisburg, PA 17101
Fax: (717) 783-8427

RE: Comment on Proposed Mortgage Regulations

I am writing to comment on the proposed mortgage regulations that would limit or eliminate stated-income and no-doc loans.

The impact of such regulations would be devastating, not only to the thousands of individual real estate investors out there like me, but also and more importantly the families that we house. Eliminating such loans would cut off the life blood of our industry – capital. While I have a 780+ credit score and a seven-figure net worth, I cannot obtain a full-doc loan because I am self-employed and have no steady income. However, I can obtain stated-income and/or no-doc loans based on my net worth and strong credit history.

What do I do with the money I borrow? So far in 2007, I have acquired over 15 properties. Approximately half of these properties have been repaired and sold to first-time homebuyers that do not have the time or expertise to rehabilitate a property on their own. I'm able to give them a great deal on their first home because I can buy quickly with a stated-income or no-doc loan. The home is improved, the value of the neighborhood increases, the new owner pays taxes and builds wealth. Aren't these great things? I also use stated-income and no-doc loans to acquire and rehabilitate properties that I then rent to people who don't want to own or cannot. It doesn't get any more basic than providing a roof over ones head. Stated-income and no-doc loans help me to provide this basic service.

Stated-income and no-doc loans are critical tools in rehabilitating our aging neighborhoods, providing first-time homebuyers with opportunities to build wealth and giving modest and low-income people a clean, safe place to live.

These are the good things that come out of prudent use of stated-income and no doc loans. Of course, there are also bad things. As my grandmother always told me, moderation is the key. Don't cut off your nose to spite your face. Regulate the mortgage people. Don't allow them to get greedy and push people into bad loans. These are the people that created the problems. Don't inadvertently destroy one of the great, entrepreneurial, All-American industries – real estate investment.

Thank you for your consideration.

Sincerely,

Thomas D. Dunkel
Chairman, CEO and President
TD Properties Unlimited, Inc.

