

# 10 - Philip Block

Gentlemen:

As a solo practitioner, I surely do not know more than the popular fiction about the in's and out's of money laundering. However, I certainly know a bit about the complexities of the paperwork in selling single family homes and condos.

I cannot understand the need for these regulations to be imposed upon the transactions of the scope that I am involved in. Certainly, the funds come from one bank or commercial lender and go to another, either for deposit or for payoff of a prior obligation. Certainly that paper trail should be sufficient to answer any concerns of yours. I could understand it if you want information about new money being brought into the transaction, but to impose across the board paperwork for funds which are clearly documented already seems a clear example of beuarcratic ignorance and imposition.

Furthermore, to make closing attorney's and other participants liable for these abuses is simply wrong. In my case, I have no idea as to the actual sources of the funds. Checks come from three sources, the lending institution, the buyer's personal funds and the check for the escrow deposit held by the realtor and go into an escrow fund. Checks go out to pay off prior mortgages, liens, title insurance, taxes and other minor expenses. Who am I to know where mortgage funds came from? Who the payoff is actually going to? Or if any of the closing expenses are phoney?

If you are following the big sums, place the burden upon the banks and lenders that will be processing the funds, not the closing agents and attorneys.

I urge you to consider the types and percentages of transactions which are truly vulnerable to the abuses you fear. Then draft your regulations accordingly.

Sincerely

Philip Block