


From: Robert L. Moorman, MAI
To: [Regulatory Comments](#)
Subject: Proposed Rule 722 - Real Estate Appraisals
Date: Wednesday, November 28, 2018 11:28:35 AM

It's amazing to me how quickly regulators, lenders, and legislators forget recessions. Raising the threshold to \$1,000,000 while still requiring "safe and sound lending practices" is a contradiction in terms. One of the comments likened this to allowing a borrower's stated, not verified, income to be the basis for their ability to repay a mortgage loan, which was a major factor leading to the Great Recession. I have to agree. After working in banks as long as I did, I have seen how lenders will push the envelope to get a deal through without thinking of the consequences long term. If they're going to be relying on "evaluators" for loan origination up to \$1,000,000, we're definitely going to see another recession.

Sincerely,

Rob Moorman

Robert L. Moorman, MAI, SRA, AI-GRS 
979-251-1998
2401 Airline Drive
Brenham, TX 77833