

**From:** [Glen Roach](#)  
**To:** [Regulatory Comments](#)  
**Subject:** NCUA Chartering and Field of Membership Manual  
**Date:** Thursday, February 04, 2016 6:22:53 PM

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Dear Mr Poliquin,

I work for a small community bank in Utah County, Utah. I am concerned about the impact of further expanding the credit union industry's potential field of membership through the proposed rule on Chartering and Field of Membership. My understanding is that the provisions of this proposal will provide federal credit unions with the ability to expand their membership drastically, resulting in a broad expansion of the credit union industry's tax subsidy.

My bank has been around since 1891 and we feel it our responsibility to serve the people of our community with their financial needs. The unfair competition given to the credit unions by allowing them to take our business and not have to pay taxes is driving customers from us. I had a local credit union refinance a gas station I had financed by offering interest rates 2% lower than what the banks can charge. This is one of many business that are being taken over by the credit unions and they pay no taxes on the income they derive. This places greater burden on the tax paying, for profit business like our bank.

Please know that socializing the financial industry of the United States by allowing this type of unfair competition to expand will not be in the best interest of all the citizens that live here. I appreciate the congress looking at the financial industry and trying to provide banking for all people. I believe in a fair market, free market system, that says people will go where they receive the best products for their dollars given competitors have a fair system to compete in. This unfair competition from the credit unions has driven all but two community banks from my town, while I have watched 6 credit unions come in and take over all the consumer lending and many of the commercial business I have financed for years.

We, as a country, cannot survive if we continue to expand the credit unions and not have them pay taxes of the earnings they make. Please do not pass the proposal to allow NCUA's to expand their field of membership beyond what it currently is.

Thank you for your consideration  
Glen B Roach

## **Glen B. Roach**

**Vice President & Manager**

**NMLS #1074924**

Phone: 801.655.2131 | Fax: 801-798-8446

[groach@cbutah.com](mailto:groach@cbutah.com) | [www.cbutah.com](http://www.cbutah.com)