

**From:** [Deb Halfmann](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Risk-Based Capital Comment  
**Date:** Wednesday, April 22, 2015 4:04:03 PM

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To: Regulatory Comments  
From: Deb Halfmann  
Auto-Owners Associates Credit Union

04/22/2015

Dear Mr. Poliquin:

I am an employee and member of a credit union and I am opposed to the revised Risk-Based Capital regulation. Although we are fundamentally different from banks, we are owned by our members and the members should have the authority and control.



Deb Halfmann  
Auto-Owners Associates Credit Union