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August 4, 2015

Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Dear Mr. Poliquin,

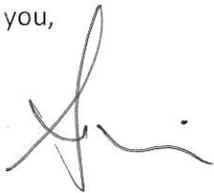
I am writing to you today to express my concern with the recent information I have learned about the NCUA's expansion plans into the commercial lending arena. I understand we all take advantage of our abilities in each of our markets and that makes good business sense. However, commercial banks such as the one I work for are specialist in this area and we adhere to very stringent safety and soundness practices. Not to mention we have heavy oversight from the OCC and internal auditing firms.

The current NCUA proposal eliminates the oversight into participation loans. In addition, these loans would not count toward the current 12.25% statutory CAP that was instituted in your current structure. The removal of the safety and soundness measure would also add a significant risk to your members as these loans would encourage borrowing that could be ill advised.



Credit Unions have a great place in our industry and are needed for their intended purposes. They have been and ideal institution for members/consumer lending needs. It was not that long ago when Texans Credit Union failed because of the massive losses associated with commercial loans. I ask that you thoroughly evaluate your proposal as it relates to your core mission and make sure it is to serve your members as your mission statement suggests.

Thank you,

A handwritten signature in black ink, appearing to read 'Sam Morris', with a stylized flourish at the end.

Sam Morris

Market President

Icon Bank

