

From: [Jean Blaine](#)
To: [Regulatory Comments](#)
Subject: RBC
Date: Friday, April 24, 2015 8:11:08 AM

Dear NCUA,

The proposed RBC rule purposefully and knowingly rewrites, in plain language, the Federal Credit Union Act, nullifying and preempting the Constitutional authority of Congress.

Any new law adversely affecting 100 million American citizens should not be concocted, administered and then enforced by an opaque, unaccountable, and unelected Agency *captive to and driven by its own self-interest*.

Avoiding the prospect of *having the powers of judge, jury, and executioner in the hands of a single entity* was the principle driving force behind the checks and balances system created by the framers of our Constitution. No “independent federal agency” should be permitted to willfully pre-empt these fundamental protections - a basic right of all American citizens.

Congress must act to block this undemocratic rule and should undertake a formal review of the mindset of an agency leadership who views its legislative authority as superseding that of Congress.

100 million Americans should not be snubbed so flagrantly and indifferently.

Jim Blaine
Concerned Citizen and Credit Union Member