

From: Tony Lesicka
To: [Regulatory Comments](#)
Subject: Real Estate Appraisals
Date: Sunday, December 2, 2018 11:25:51 PM

To whom it may concern,

I am writing to express my strong disagreement with the proposal to raise the appraisal threshold level for non-residential loans to \$1 million, up from \$250,000. My firm has extensive experience with Credit Unions, and it is my opinion that, at the very least, they should have the same requirements as banks do, if not even more stringent requirements. I have worked in the bank/credit union world, including at a bank that had acquired several failed banks after the credit crisis. Working at that bank, I saw the aftermath of inexperienced commercial lending, and a complete disregard for the collateral component of a commercial real estate transaction. I learned what the phrase "an ounce of prevention is worth a pound of cure" really means. And I am also intimately familiar with several Credit Union Service Organizations, and how they operate. In my experience, they need more stringent adherence to the collateral component of underwriting commercial real estate, not less.

I have also seen the real world effects of uneven regulation, between the different regulators at several of the banks and credit unions that we do business with. Such imbalances do tremendous damage to the markets, and frankly, they de-stabilize things. It's much better, in my opinion, to have everyone on a level playing field.

Please let me know if you would like to discuss any of my experiences in greater detail. I trust you'll make a prudent and diligent decision regarding the appraisal threshold.

Tony Lesicka, MAI
Principal
Insight Realty Advisors, Inc.
275 E 4th Street, Suite 325
St. Paul, MN 55101
Phone: 651-983-2408
Web: www.insightrealtyadvisors.com
MN Certified General Real Property Appraiser License #20371321
WI Certified General Real Property Appraiser License #1400-10
IA Certified General Real Property Appraiser License #CG03439