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To: [Budget Comments](#)
CC: [Dan Bremer](#); [John Brubaker](#); [MIDCUA \(brubaker@midcova.org\)](#); [Frank Diekmann](#)
Subject: Compliance Examination Comment
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Attachments: [image001.png](#); [image002.png](#); [image003.png](#); [image004.png](#); [image005.png](#); [image006.png](#); [image007.png](#); [image008.png](#); [image009.png](#); [image010.png](#)

To Whom It May Concern:

NCUA already trying this! It was a failure of major proportion. Should be handled in the regular examination. If the examiner identifies or believe there are problems, then he can expand the examination if necessary.

As a former examiner during the time period when NCUA had a consumer compliance examination, it caused real issues between examiners and the credit unions! It made the process more hostile than necessary.

At a credit union named Bull Dog, then Examiner David Marquis and myself listed over 130 consumer compliance issues. Most were clerical in nature and had nothing to do with rates and terms. The Regional Office was not happy with us for identifying so many minor issues. Most credit unions are using services that attempt to keep credit unions in compliance like CUNA Mutual. Not sure there are material issues that would warrant this expense not only monetary, but also time and aggravation!

Please look at the history of this misguided idea. The compliance examination almost caused a revolt in the industry.

More credit unions that focus on underserved will chose to close! So much for Mr. Hood's desire to expand service.

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