

From: [James Dingman](#)
To: [Regulatory Comments](#)
Subject: BankORION Comments on Chartering and Field of Membership Proposed Rule
Date: Tuesday, November 26, 2019 10:40:07 AM

Dear Secretary of the Board Poliquin,

I am writing in response to the National Credit Union Administration's (NCUA) proposal to amend its chartering and field of membership (FOM) rules with respect to applicants for a community charter approval, expansion, or conversion. BankORION does not believe that the proposed framework will adequately guard against discriminatory redlining and recommends that NCUA adopt the anti-discrimination tools utilized by other federal banking agencies.

BankORION is subject to rigorous CRA rules and annual examinations. Our board and staff are more than happy to comply with CRA. We often exceed the expectations of the regulations.

If the agency wants to ensure that its supervised federal credit unions do not discriminate by redlining urban cores, then it should employ some of the same tests and assessments that my regulator uses with my bank.

Sincerely,

James Dingman
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