From: Plexus Capital, Bob Anders

Subject: CRA Regulations Hearings

Comments:

I am Bob Anders, and manage Plexus Capital, which manages two SBIC funds. I support the incentive for commercial banks to invest in SBIC funds, and to receive full CRA credit.

Investments in SBICs and in funds that invest exclusively in SBICs should, at a minimum, receive full CRA credit. Regulators should consider giving credit for the amount of SBIC capital that is released because the bank invested in an SBIC and not another vehicle.

SBICs are highly regulated to ensure that all the investments are made in domestic small businesses - our best job creators. Without small business investment, communities generally cannot thrive.

SBICs provide capital to a niche in the small business marketplace that is otherwise underinvested. Patient capital is difficult for small businesses to access.

Small business anchor the economies of most communities.

SBICs investments are long term investments and it is difficult to determine in advance which footprint an SBIC will invest, but it is with 100% certainty that it will be in a promising domestic small business. SBICs commonly invest in areas of the country that lack significant private equity investment.

It would be a mistake to limit investment to a small footprint because 1) this would ensure that areas with minimal financial activity continue to have minimal investment and 2) areas with high financial activity may not be the best place to deploy investment capital for both market and social reasons.

Giving clear, full credit for commitments to SBICs ensures that capital will go to small businesses that are otherwise too small for large private equity or other firms to invest in.

Thank you.

Bob Anders

Plexus Capital