

From: Banner Banks, Gary Reiche
Subject: HMDA - Notice of Public Hearings

Comments:

Dear Sir/Madam:

My Name is Gary Reiche from Banner Banks

I would ask that you consider eliminating certain Agricultural Loans from HMDA Reporting.

Example - I have loans that are secured by perhaps 400 Acres of Farmland and Farm Personal Property, all in one note for \$\$\$\$\$\$\$\$, written to mature in one year. The mortgage does include the farmers house as part of the 400 acres.

Then he applies and receives a \$\$\$\$\$\$\$\$ loan to purchase a tractor. This could be a side note to come due and be included in the "Big Farm Note".

As a result of the additional \$\$\$\$\$\$\$\$ tractor note being added "Big Note", present interpretation of the HMDA rules make this a HMDA applicable loan, based upon refinance interpretation.

My opinion is that this loan should not be a HMDA applicable loan.

It's an Agricultural Note, reported on the Call Report as a Note "Secured by Farmland". It is not subject to Regulation Z, "Truth in Lending", or RESPA.

Presently, a purchase of the property described above would not be subject to HMDA. But if you add funds for a tractor purchase it is!!

It would be hard to believe that this is the type of loan in which the original spirit of the law was intended.

Thank you for your consideration.

Gary P. Reiche
Banner Banks