

From: FDIC Sate Chartered Bank, Terry Van Engen
Proposal: 1490 (RIN7100-AE19) Reg AA - Repeal of Unfair or Deceptive Acts or Practices
Subject: Regulation AA

Comments:

Date: Aug 27, 2014

Proposal: Regulation AA: Unfair or Deceptive Acts or Practices [R-1490]

Document ID: R-1490

Revision: 1

First name: Terry

Middle initial:

Last name: Van Engen

Affiliation (if any): FDIC Sate Chartered Bank

Affiliation Type: Commercial (Com)

Address line 1: 302 East Towne Dr.

Address line 2:

City: Random Lake

State: Wisconsin

Zip: 53075

Country: UNITED STATES

Postal (if outside the U.S.):

Your comment: I believe that examiners need additional levels of documenting a compliance issue during the examination process. There is currently no room in the process to point out oversights on the bank's part without reprimanding the bank with a UDAAP violation. We generally do not do things to deliberately deceive the client, because if we did we wouldn't have any clients left.