Sage Capital Bank
Financial Wisdom. Texas Roots.

February 7, 2014

Monica Jackson
Office of the Executive Secretary
Bureau of Consumer Financial Protection
1700 G Street, NW
Washington, DC 20552

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Robert de V. Frierson, Secretary
Board of Governs of the Federal Reserve
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket NO. OP-1462

Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Mail Stop 9W-11
400 7th Street, SW
Washington, DC 20219
Docket ID OCC-2013-0014

Elizabeth M. Murphy, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090
File No. S7-08-13

RE: *Proposed Interagency Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Banks Regulated by the Agencies*

Dear Sir or Madam:

Sage Capital Bank is located in Gonzales, Texas and was chartered in 1984. We have $345M in assets, 6 branch locations and 74 full time employees. We are an equal opportunity employer with women and minorities holding key positions throughout our organization.

I am extremely troubled by the above referenced Interagency Policy Statement. The passage of the Dodd-Frank Act created an avalanche of new regulations and a staggering compliance cost burden for community banks. This burden is ever increasing as more and more layers of Dodd-Frank are unfolded. This Proposed Interagency Statement is a prime example of the unnecessary government interference in an already over-regulated industry.

In our case, four of our six branch locations are situated in rural areas with large Hispanic populations. We fully understand that having our employees reflect the demographics of our community is essential to our survival. We have an Affirmative Action plan in place, which is tested each year for compliance.

1606 North Sarah Dewitt Drive | Post Office Box 1940 | Gonzales, Texas 78629 | (830)672-8581 | 1(800)987-2773 | FAX: (830)672-6226
www.SageCapitalBank.com

Every effort is made in our hiring process to comply with EEO requirements. Even with the additional standards for assessing diversity, our hiring process will not change.

While the Proposed Interagency Statement is being promoted as a "guideline" or best practice "suggestion" we know from experience that these "guidelines and suggestions" become enforced as if they were statutory requirements.

The bottom line here is that this proposal imposes yet another onerous and costly compliance burden upon community banks that will not have any impact on work force diversity. The added cost of doing business will once again increase the cost of services to our customers. Your careful re-consideration of this proposal would be greatly appreciated.

Should the agencies move forward with this proposal in its current form, we will stand firmly with our State trade association to challenge its implementation through all legal means available.

Please feel free to contact me directly should you wish to hear more about how this proposal and many other provisions of Dodd-Frank are negatively impacting my community bank and ultimately increasing the cost of banking services to my customers.

Sincerely,

Joseph M. Rankin, III
President & CEO

CC: J. Eric T. Sandberg, Jr.