LEWIS WEISE LLC, ROBERT WEISE

Proposal and Comment Information

Title: Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks; Bank Holding Companies (Reg O and Y), R-1896

Comment ID: FR-2026-0028-01-C02

Submitter Information

Organization Name: Lewis Weise LLC

Organization Type: Company

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Submitted Date: 08/01/2026

1. Policy Shift: Regulation O currently restricts member banks from extending credit to executive officers, directors and principal shareholders of member banks. This policy should be changed to replace rigid lending ceilings with dynamic, granular reporting to eliminate credit bottlenecks while maintaining market discipline.

2. Streamline Lending: Substantially increase specific dollar limits under 12 CFR 215.4 on loans to executive officers, directors and principal shareholders of member banks, retaining a "cash reserve" like that of property casualty insurers under state laws. Maintain rules requiring arm's-length terms and standard credit underwriting. Eliminate mandatory prior board approval for low-risk, market-rate extensions of credit to executive officers, directors, and principal shareholders of member banks.

3. Enhance Disclosures: Implement a specific, granular quarterly schedule for all outstanding insider credit lines. Require real time public electronic disclosure of any loans to executive officers, directors, and principal shareholders exceeding $250,000 within ten (10) business days. Enforce an annual board-level certification disclosing any loans for which preferential terms were granted and the reasoning for such loans. In the alternate, board certification that in fact zero preferential terms were granted.

4. Leverage Market Dynamics: Public transparency allows shareholders and the consuming public to choose to avoid banks with aggressive insider credit concentrations. Banks can improve talent acquisition/retention efforts with the ability to offer, in addition to other financial incentives, competitive credit packages to executive officers, directors, and principal shareholders. Moreover, banks achieve operational relief by lowering compliance overhead and auditing costs tied to tracking complex, shifting legal lending limits.