

From: St. John National Bank, Nolen G Taton
Subject: Revision to Escrow Account

Comments:

Date: Apr 29, 2011

Proposal: Regulation Z - Truth in Lending Act - Revision to Escrow Account
Requirements for Certain Home Mortgage Loans
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Comments:

From: Nolen G. Taton, St. John National Bank,

Subject: Revision to Escrow Account Date: April 29, 2011 Proposal: Regulation Z - Truth in Lending Act - Revision to Escrow Account Requirements for Certain Home Mortgage Loans
Document ID: R-1406 Document Version: 1 Release Date: 02/23/2011 Name: Nolen G. Taton, Pres./CEO
Comments: Thank you for your time. We are a \$70 million central Kansas rural community bank serving our County with two community bank locations. Our county population is under 5000. The 4 communities that we primarily fund residential real estate loans for are 1200 or less people each. There remains a huge need for our funding of Residential Home Loans. The large Metro institutions have absolutely no interest in our rural communities so we are the people's best hope of buying, building, and improving really nice homes in our communities. And we love doing it for them. We do not even get close to the number of loans it would take to make it feasible to implement escrow accounts for these families. Our profit margins are thinning each year from over-regulations we incur from those who actually have caused the problem. It was not banks like mine or in rural Kansas, for sure. We have NEVER had insurance or tax default of a home loan customer. I have been at this for 35 years. Our customers put 20% or more down and pay their own tax and insurance obligations. Rural people don't need to be told how to be responsible. If we are forced to establish escrow services, our board will more than likely abandon residential real estate lending altogether. We cannot do it for nothing or at a loss. The success of our bank is critical to the community and that means we must maintain a reasonable profit. Please continue to give due consideration by to the proposed Revision. Cordially, Nolen G. Taton Pres./CEO