NexGen Capital

Advisors
Consultants
Investors

Lawrence C. Manson, Jr.
Chairman and Chief Executive Officer
lmanson@nexgencp.com

August 31, 2010

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Attention: ID OTS-2010-0019

Re: Community Reinvestment Act Regulation Changes Public Comments

Dear Sir or Madam:

I am the Chairman and Chief Executive Officer of NexGen Capital Partners, LLC, an African-American led investment firm based in Chicago, Illinois. NexGen's mission is to finance small business in America by selling securities to financial institutions pursuant to the Community Reinvestment Act (***CRA***). Our capital raising initiatives help to create, retain and maintain jobs in order to stabilize communities across America. I greatly appreciate the opportunity to provide comments as the Agencies consider revising the Community Reinvestment Act regulations to better serve the original goals of the Act and meet the needs of the United States economy that has vastly changed since CRA became law in 1977.

In our country's current economic climate, as in previous recessions, job creation by small businesses will lead the United States out of recession. In addition, the availability of jobs and attaining or retaining housing are inextricably intertwined. Without jobs, people cannot buy or rent homes, stay in their current homes or keep our communities stable.

NexGen Capital agrees with comments made by many of the witnesses at the four hearings held by the Agencies in July and August of this year and commends them for holding these hearings across the country.

NexGen Capital respectfully requests that the Agencies focus on the following as new regulations to CRA are considered:

- Re-enforce, clarify and provide consistency to financial institutions and their examiners that commitments of private capital to SBICs and in funds that invest exclusively in SBICs should receive full investment credit under CRA because collectively SBIC funds finance small business;

- Focus on the complete individual footprint of each financial institution, not just the physical locations where they accept deposits. When the 14 largest institutions in America now hold 48 percent of all deposits, regulations should be in place to address the national size and scope of these particular institutions and recognize their nationwide presence and give them the flexibility to creatively address their CRA requirement with this contextual content;

- Require that financial institutions make CRA investments for the specific purpose of job creation, retention and maintenance. Existing CRA requirements already allow for the use of federal funds to create jobs through financing small businesses;

- Allow financial institutions to make CRA investments which solve those problems anywhere in the country, not solely in an individual financial institution's assessment area such as job creation, disaster relief as designated by any federal, state or local government or general community development in distressed or underserved middle-income rural areas.

Thank you for the opportunity to provide these comments as you begin the work of enhancing and updating the regulations that implement the Community Reinvestment Act. If I may be of further assistance, please contact me either at my office: 312.845.9055 or my e-mail address: lmanson@nexgencp.com.

Sincerely,

Lawrence C. Manson, Jr.