



Improving Lives, One Community at a Time

December 21, 2022

Amegy Bank of Texas, a division of Zions Bancorporation, N.A.
1717 West Loop South
Houston, TX 77027

Office of the Comptroller of the Currency
Southern District Dallas Field Office
225 E John Carpenter Freeway, Suite 900
Irving, TX 75062

RE: Complaint against Amegy Banks' Predatory Credit Policy

The undersigned community organization is submitting this letter to file a complaint against Amegy Bank.

The Community Reinvestment Act (CRA) is a law intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income (LMI) neighborhoods.

Amegy Bank is not meeting the small dollar credit needs of our community, which specifically includes low- and moderate-income neighbor located in Southern Dallas. Amegy Bank *fails* to provide any type of small dollar loans in the DFW MSA.

Federal Agencies Share Principles for Offering Responsible Small-Dollar Loans

<https://www.fdic.gov/news/press-releases/2020/pr20061.html>

<https://www.fdic.gov/news/financial-institution-letters/2020/fil20058.html>

Amegy Bank *fails* to invest in CDFIs that do small dollar loans in the DFW MSA.

Small Dollar Loan Program - CDFI Fund

<https://www.cdfifund.gov/programs-training/programs/sdlp>

<http://www.clcofdallas.org/>

Amegy Bank does finance predatory lenders that can charge over 400% interest in minority communities

According to the advocacy group Texas Appleseed, in 2019, payday and auto title lenders charged Texans more than \$2 billion in fees. While Blacks and Latinos make up 45% of all Texas households, they make up 71% of auto title customers, and 74% of payday loan customers, according to an analysis of FDIC data by Texas Appleseed.

<https://www.wfaa.com/article/money/diabolical-and-wrong-wells-fargo-other-banks-finance-predatory-lenders-that-can-charge-over-400-interest-in-minority-communities/287-f84efb8d-0936-443e-97ad-493776cc153f>

Change in Credit Policy

Some banks have begun to change their policies on financing predatory lenders. Amegy Bank has not change their credit policy and still finances payday and auto title lenders.

Amegy Bank avoids meeting the credit needs of our underserved community and supports payday lenders that engage in Reverse Redlining.

Conclusion

The CRA regulation is very clear — a finding that a bank failed to comply with laws on fair and responsible lending trumps otherwise satisfactory or even outstanding CRA performance. The CRA regulations specifically state that a rating will be "adversely affected by evidence of discriminatory or other illegal credit practices," including but not limited to violations of the Equal Credit Opportunity Act, the Fair Housing Act, the Home Ownership and Equity Protection Act, the Federal Trade Commission Act, the Real Estate Settlement Procedures Act, and the Truth in Lending Act.

We would look forward to this case being reviewed and referred to the U.S. Department of Justice (DOJ) and the Consumer Financial Protection Bureau (CFPB).

Sincerely,

James McGee

James McGee
President/Chair

JMcGee@SouthernDallasProgress.com

Southern Dallas Progress Community Development Corporation