

January 9, 2023

Mr. James McGee  
Southern Dallas Progress Community Development Corporation  
1402 Corinth St. #147  
Dallas, TX 75215  
Via Email – [jmcgee@southerndallasprogress.com](mailto:jmcgee@southerndallasprogress.com)

**RE: Letter to Office of the Comptroller of the Currency (OCC) dated 12/21/2022  
OCC Case # 03382862**

Dear Mr. McGee:

We are in receipt of a copy of your letter to the OCC in which you express dissatisfaction with Amegy Bank's performance in meeting the credit needs of low and moderate-income residents of the southern Dallas neighborhoods within the Dallas MSA. We will comment on the three components of your complaint letter individually.

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

Our analysis of lending data for the calendar year 2021 shows that Amegy Bank, as a division of Zions Bancorp, has made small dollar loans throughout the Bank's footprint, including the DFW MSA and specifically southern Dallas. These loans were made to individuals and small businesses commensurate with our Credit Policy and in keeping with safety and soundness considerations.

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

Investing in CDFIs throughout the Zions Bancorp enterprise is an important component of helping to meet the credit needs of low and moderate-income individuals and small businesses. During this current CRA exam cycle, Zions has made several investments in CDFI's and other entities that make loans to small businesses. These include funds that cover the DFW MSA, and specifically southern Dallas, within their scope of work.

3. *Amegy finances predatory lenders that can charge over to 400% interest in minority communities.*

Amegy's credit policies continue to align with existing laws and banking regulations. We leave the decisions regarding which businesses should be allowed to legally operate to the elected officials and the enforcement of such laws to the appropriate authorities.

James, it has been a pleasure working closely with you through our in-person meetings and ongoing collaborations. We look forward to continuing to partner with Southern Dallas Progress and other organizations in our efforts to provide needed services to the underserved communities in the markets in which Amegy Bank does business.

Sincerely,

A handwritten signature in blue ink, appearing to read 'CM', with a large loop at the bottom.

Carlos Munguia, Amegy DFW Market President

A handwritten signature in black ink, appearing to read 'Mark Magee', with a large loop at the bottom.

Mark Magee, Amegy Community Banking Manager