

Proposal: 1813 (AG64) Reg H, Q, LL & YY-Regulatory Capital Rule: Amendments to LBOs and Banking Organizations

Description:

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From: Shawn Danforth

Proposal: 1813 (AG64) Reg H, Q, LL & YY-Regulatory Capital Rule: Amendments to LBOs and Banking Organizations

Subject: R-1813 Regulatory Capital Rule: Amendments Applicable to Large Banking Organizations and to Banking

Comments:

I am writing to you today as a concerned member of the Oneida-Mohawk Band of Iroquois living in Helena, Montana. One of the primary issues I witnessed during my years of service with the Crow Tribe is the housing challenges and the general lack of access to credit that continue to plague Indian Country across Montana's seven Indian Reservations. These challenges have not only impeded economic growth but have also perpetuated a cycle of poverty and limited opportunities for our communities.

I am writing to express my concerns about the potential consequences of increasing capital requirements on banks. In Indian Country, our people often face serious challenges when it comes to obtaining credit and financing for housing, businesses, and education. Many financial institutions are reluctant to operate within our reservations due to perceived risks, making it even more difficult for tribal members to access credit at reasonable terms. Increasing capital requirements on banks could further discourage them from engaging with our communities, exacerbating an already dire situation.

Higher capital requirements may lead to several adverse consequences for the Native American communities in Montana. First, it could limit the availability of loans and credit to tribal members, making it even more challenging for individuals and businesses to secure the funds they need to invest in their future and contribute to the economic development of their reservations. This perpetuates the housing issues and financial disparities that we are striving to overcome. Second, such regulations may drive up the cost of credit for Native Americans who can access it, making loans less affordable and less accessible. This will undoubtedly affect those in my community who are already on the fringes of financial stability and limit their ability to build a better future for themselves and their families.

Given these concerns, it is vital that you consider the difficulties faced by Native American communities when considering changes to capital requirements on banks. Instead of supporting this proposal that would widen existing disparities, I urge you to develop policies that address the specific needs of our communities and help bridge the financial gap that exists in Indian Country.

Shawn Danforth
Helena, MT