

ANONYMOUS

Proposal and Comment Information

Title: Prohibition on Use of Reputation Risk or Other Supervisory Tools to Encourage or Compel Banking Organizations to Engage in Politicized or Unlawful Discrimination, R-1884

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Submitter Information

Name: Anonymous

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It is imperative that banking and other financial institutions be held to a strict level of neutrality free of public opinion. Digital access nowadays is mostly synonymous with financial access. Stopping a legal digital transaction between involved parties or persons restricts their ability to participate in the economy.

Reputation risk and similar supervisory concepts are too vague and too easily influenced by political or social pressure. They create a pathway for financial institutions to impose subjective judgments on lawful occupations, resulting in unequal and unjust exclusion.

If financial institutions serve as the gatekeepers to the systems that now function as money, then they must be held to a standard of neutrality. Lawful activity should be the line. Not public opinion. Not political climate. Not reputational discomfort.