

# KIEFER MUELLER

## 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

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"Reputational risk" is a vague term that banks and payment processors have historically used to deplatform and disenfranchise people they deem as unsavory. It is not their place to do so! Unless laws are being clearly broken, neither kind of institution should have the authority to refuse services. A cornerstone of America is free trade and commerce, and institutions like these must be free to all. Reputational risk should be explicitly prohibited for use as a condition.