

October 2, 2014

Legislative and Regulatory Activities Division  
Office of the Comptroller of the Currency  
Mail Stop 9W-11  
400 7<sup>th</sup> Street SW  
Washington, DC 20219

Robert deV. Frierson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue NW  
Washington, DC 20551

Robert E. Feldman, Executive Secretary  
Attention: Comments, Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW  
Washington, DC 20429

RE: Community Reinvestment Act: Interagency Questions and Answers Regarding  
Community Reinvestment  
OCC – Docket ID OCC-2014-0021

Dear Regulators:

On behalf of the historic Freedman's Town/Fourth Ward and disadvantaged communities in Houston, Texas, I present the following questions and answers or comments to assist financial institutions to best serve our Moor populations:

1. Access to Banking Services – A. Availability and Affectiveness of Retail Banking Services  
12 CFR \_\_.24(d): Examiners and banks fall short in availability and affectiveness of delivery of service and alternatives in that branch banks are not easily visible, if at all, in Moor communities while ATM services absent. Even if ATM services available they are at extreme perimeters of Moor communities and the service fees extremely high. So while regulators wrestle with verbage, because that is basically all that it appears to be, the affectiveness falls short. Please do not cite criminal acts on ATMs when Wall Street and financial industry steal 24/7 from Moors. Meet with the Moor community and get input on "affectiveness" in providing banking services for them actually in the heart of their communities. Do not await gentrification before banks take affectiveness because in most cases it is too late then.
2. II. Innovative or Flexible Lending Practices  
12 CFR \_\_.22(b)(5): The preventive words here are "safe" and "sound" when addressing the credit needs of low or moderate income geographies or individuals. No loan or financial investment is safe or sound, check Wall Street and the bailouts of banks. In Houston, Texas there is ongoing construction for affluent, luxury multi-family apartment and condo living. One major complex was completed when it caught fire prior to last minute finishes. If construction ever ceases here the real depression will surface. There is no lending flexibility for the Moor community but a standard bank policy to not lend. The alleged innovation is ineffective and not meant to work. Moors do not receive small business loans no matter how "flexible" banking

says it is. There is no alternative credit histories utilized to benefit low or moderate income individuals. Houston's historically Moor inner city reflects a glaring bank disparity that is akin only to the disparity of Moor owned businesses regarding contract awards. Why you regulators need constant input from banks on why they fail meeting true standards of compliance with the CRA is amazing. Any competent and fair examiner would see that banks failed by viewing the disparity of the gentrified surrounding area with blatant pockets of poverty and the absence of Moor owned businesses.

Section \_\_.22(b)(5) on mortgage or consumer lending is no different. Cases of Moors have an 820 credit score with more than sufficient funds in the bank or mortgage loan is denied. No matter what the CRA rules or laws or policy states, the unwritten culture of regulators, examiners and banks is "Take all they have but give them nothing." What is the ethnic makeup of your boards, examiners and bank administrators? Surely not Moor so how are we to believe that you want to give up a portion of your leadership to be fair to us? Examiners approve banks despite the CRA because of the "safe and sound" used to prevent making sufficient loans to Moors. The contracting industry with the local and state levels use "good faith effort" to limit Moor contract awards to less than 1 percent.

There is no existing or proposed questions and answers to make a bank compliant with the CRA because of intentional human omission or error in fairness. Unless the Moor community actually starts receiving loans across the board as Europeans here, our economic growth will continue dwindling to a detrimental point for all of America. Racism costs the whole when directed at the few.

- A. Economic Development – CFR \_\_.12(g)(3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administrations' Business Investment Company programs. Key words here are "promote economic development". Activities meet the purpose test if they "support permanent job creation, retention, and/or improvement for persons who are currently low-or moderate-income, or support permanent job creation, retention, and/or improvement either in low or moderate income geographies or in areas targeted for redevelopment by Federal, state, local, or tribal governments." Moors have the highest unemployment due to lack of financing from banks to create business growth, employment and economic expansion. It is quite clear that economic development is not being promoted in the Moor community with the assistance of banks and regulators who overlook the anti CRA examinations conducted by examiners. Again, until Moors are placed in the authoritative and positions of power of regulating entities, in banks and as examiners, the anti CRA movement will continue. Your list of what considers to promote economic development excludes the very measures of affective corrective action mentioned above.
- B. Community Development Loans – CFR \_\_.12(h) defines "community development loan" to mean a loan that has community development as its primary purpose. It is the unwritten policy, again, of regulators, banks and examiners to not enforce or implement such as its primary purpose for Moors.
- C. Revitalize or Stabilize Underserved Nonmetropolitan Middle-Income Geographies – CFR \_\_.12(g)(4) continues as it defines community development to include activities that revitalize or stabilize particular areas. Historic Freedman's Town/Fourth Ward in Houston, Texas just cannot obtain banks' support flexible or standard for community or economic development to revitalize: promoting homeownership for low income families, construction and operation of a needed youth center facility, small business development and job training and placement. Their definition is no different than that used by regulators, examiners and banks, yet, revitalization lending and grants are constantly denied this area.

Examiners ignore letters of protest while regulators disregard them as well. Who can Moors complain regarding this standard discriminatory practice and policy to flexibly exclude and omit Moors from the “protection” supposedly offered by the CRA? Where is justice for Moors? Lending is made all around Moor communities but to Europeans who further gentrify Moor areas.

3. Whether our questions are new or old the result remains exclusion of Moors in the receipt of loans/grants, administrative regulator board positions, key examiners and bank administrators; and until these questions are met with the corrective action required to remove racism this entire process is a lie.

Presented by Gladys M. House.  
Houston, Texas 77019

Faxed today, Thursday, October 02, 2014 to the said regulators.