Color
How to respond?
Is any of this possible
Re

National Office
930 East 50th Street
Chicago, IL 60615
Phone: 773-373-3366
Fax: 773-373-3571

Washington, DC Bureau
1002 Wisconsin Ave., NW
Washington, DC 20007
Phone: 202-333-5270
Fax: 202-728-1192

New York Bureau
330 West 42nd St.
Suite 1511
New York, NY 10036
Phone: 212-425-7874
Fax: 212-968-1412

Los Angeles Bureau
12021 Wilshire Blvd.
Suite 700
Los Angeles, CA 90025
Phone: 310-889-1111
Fax: 310-471-1453

Detroit Bureau
[illegible] National Building
[illegible] Woodard Ave.
Suite 1433
Detroit, MI 48226
Phone: 313-963-9005
Fax: 313-963-9012

Copied
Sperling
Podesta

October 28, 1999

10-28-99

The Honorable William Jefferson Clinton
President of the United States of America
The White House
Washington, D.C. 20500

Dear President Clinton:

I pressed hard for a Financial Services Modernization bill that took a strong stand on the Community Reinvestment Act (CRA). When it became clear that the final bill would assure that CRA remains vital and relevant in the new financial landscape, I was quick to praise it and I still do.

However, when I look at some of the finer details of the bill, I believe that changes are still needed to address the ominous language of the "sunshine" provisions. While I support the notion that community organizations should be held accountable, I believe the detailed reporting language will cast a pall over CRA by local community groups. Additionally, I am concerned that the real reason for these provisions is to collect the necessary data for future attacks on CRA. These provisions implicitly support the premise that community groups are engaged in extortion and fraud regarding CRA. These reporting and penalties will have a chilling effect on groups' efforts to highlight weaknesses in bank performance as well as their efforts to forge partnerships with lenders.

I believe that in addition to the significant changes already made, two modest additional changes are necessary to restore equilibrium to CRA. These changes would in no way adversely affect the bill and they should be supported by the banking industry.

First, under the CRA Sunshine Requirements, I would like to see the proposed new Sec. 48 (c)(3) of the FDI Act elimina[illegible] information requested under these reporting requirements is too

highly detailed and burdensome, particularly for small community groups who do not maintain information in this format.

Second, efforts were made in the legislative drafting to narrow the scope of activity defined as a "CRA agreement," limiting it to activity relating to bank applications and examinations. I believe that the proposed new Sec. 48 (e)(1)(B)(ii) should eliminate references to individuals and organizations that have "discussed or otherwise contacted the institution" concerning CRA. These phrases case an extremely broad net and would cover situations where a bank – even one with no application pending or a scheduled CRA exam – approached a community group about establishing a partnership that might be counted as part of its CRA record. Without a change, community groups will rightly fear that even the slightest criticism of bank performance will ensnare them in a federal regulatory review.

Lastly, I understand that several privacy groups are unhappy with the bill. While some progress has been made, more needs to be done.

We are in the final throes of this process, and I need your support for these changes to the bill. I believe that with these adjustments we can create a stronger piece of legislation that serves both the financial industry and their local community partners.

Sincerely,

Rev. Jesse L. Jackson, Sr.