

**From:** Lela Graham [REDACTED]  
**Sent:** Monday, October 16, 2023 12:44 PM  
**To:** Comments  
**Cc:** [REDACTED]  
**Subject:** [EXTERNAL MESSAGE] Docket Number: R-1813/RIN: 7100-AG64

[REDACTED]

I am writing to express my deep concerns about the potential impact of raising capital requirements on homeownership in Montana and nationwide. As a former Democratic Legislative candidate and local democratic activist, I have always advocated for policies that promote affordable housing and economic stability for working-class Americans. In light of this, I urge you to carefully consider the consequences of any decision to raise capital requirements for financial institutions.

I personally experienced many challenges as a first-time homebuyer in Great Falls, especially in today's difficult real estate and lending environment. Homeownership is a fundamental part of the American dream, providing financial security, stability, and a sense of pride. However, for many, this dream remains out of reach without the assistance of mortgage loans.

Raising capital requirements for banks and lending institutions would exacerbate the hurdles that prospective homebuyers must overcome. Higher capital requirements would make banks less likely to extend credit to individuals with less-than-perfect credit scores or limited down payment resources. This could disproportionately affect first-time homebuyers and those with lower incomes.

When financial institutions are required to hold more capital in reserve, they may pass on the increased costs to borrowers in the form of higher interest rates and fees. This would make homeownership even less affordable for many aspiring buyers.

While I understand the importance of financial stability and the need to protect against systemic risks, I also know that our banks are fully prepared to handle any potential crisis. The COVID-19 pandemic was a real life stress test, in which our banks were able to support our economy. The Federal Reserve has even stated that our banks are "are well positioned to weather a severe recession" should it come down to that.

Thank you for taking into account the voices of those who may be affected by these decisions, and I hope that you will prioritize policies that promote financial inclusion and homeownership opportunities for all Americans.

Lela Graham  
Great Falls, MT

--

