



December 29, 2025

Office of the Comptroller of the Currency 400 7th Street SW Suite 3E-218 Washington, DC 20219

**Re: Docket ID OCC-2025-0142-0001; Comment on Prohibition on Use of Reputation Risk by Regulators and "Fair Access" Standards**

To the Office of the Comptroller of the Currency:

On behalf of the Amusement & Music Operators Association (AMOA), we write in support of the joint OCC/FDIC notice of proposed rulemaking (NPRM) associated with the Executive Order issued by President Trump on August 7, 2025, entitled "Executive Order on Politicized or Unlawful Debanking."

Beginning in 2013, with the Obama Administration's ill-conceived Operation Choke Point and up until President Trump's decisive action earlier this month, our industry has been plagued by debanking, often with no explanation and always with no recourse or appeal.

Founded in 1948, the AMOA is the national trade association representing thousands of independent business owners in the coin-operated amusement, jukebox, and ATM operator industries. Our members are primarily family-owned small businesses operating in all 50 states, providing not only entertainment services to local communities, but also financial infrastructure via independently operated ATMs to rural communities underserved by traditional financial institutions.

More than 25% of our members have been debanked or denied access to core financial services due to vague justifications tied to "reputational risk," despite long-standing records of compliance, licensure, and tax reporting. These closures have led to payroll disruptions, cash access breakdowns, and in some cases, business closures.

This issue, which initially began with major banking institutions, has now reached mid-size banks, community banks, and credit unions, quickly leaving our members without financial institutions that will accept their legitimate business.

Our member businesses are the definition of "Main Street" commerce. We provide essential services to our local community, many of whom rely on coin-operated machines because they are unbanked or underbanked themselves. However, because my business is legally and necessarily cash-intensive, I have been treated by the banking system not as a customer, but as a suspect.

The proposed rule is critical because, under the current "debanking" status quo, small business owners like myself face an existential threat: the sudden, unexplained closure of our operating accounts.

Banks often categorize coin-operated businesses as "High Risk" for money laundering simply because we deposit cash. This broad-brush categorization ignores the reality of our operations:

- **Legal Tender:** We deal in U.S. currency, yet we are penalized for depositing it.
- **Traceability:** Our businesses use modern counting equipment and maintains rigorous tax records. We are legitimate, transparent, and compliant.
- **No Recourse:** When a bank closes an account based on vague "reputation" or "category" risk, it blacklists the business. Finding a new bank becomes a nightmare, forcing us to carry dangerous amounts of cash or operate without payroll services.

**Support for Objective Standards** Our members specifically support the OCC's move to require banks to conduct **individualized risk assessments** rather than terminating entire categories of customers.

A bank should be required to look at *our* businesses—our history, our compliance controls, and our actual transaction data. If we are breaking the law, take action. But do not cut off our lifeline to the economy simply because we operate a business that collects quarters and dollar bills. That is not "risk management"; it is laziness and discrimination against lawful commerce.

**Conclusion** Access to a bank account is not a luxury; it is a utility required to pay taxes, employees, and vendors. By finalizing this rule, the OCC will ensure that banks return to their core purpose: judging customers on their merits, not on opaque "reputation" metrics that serve as a cover for de-risking entire legal industries.

Thank you for your attention to this critical issue.

Sincerely,

Brian Brotsch  
Amusement & Music Operators Association (AMOA)  
President  
[www.amoa.com](http://www.amoa.com)

Lori Schneider  
Executive Vice President  
Amusement & Music Operators Association (AMOA)  
[www.amoa.com](http://www.amoa.com)