State of West Virginia
Office of the Attorney General
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December 29, 2025

The Honorable Travis Hill
Chairman, Federal Deposit Insurance Corporation
550 17th Street NW
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The Honorable Jonathan V. Gould
Comptroller of the Currency
Office of the Comptroller of the Currency (OCC)
400 7th Street SW, Suite 3E-218
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Submitted Electronically via Regulations.gov

Re: Comments on Proposed Rulemaking Titled "Prohibition on Use of Reputation Risk by Regulators" by the Attorneys General of the States of West Virginia, Alabama, Arkansas, Florida, Georgia, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Missouri, Mississippi, Montana, Nebraska, North Dakota, Ohio, Oklahoma, Pennsylvania, South Carolina, South Dakota, Texas, Utah, and Wyoming (Docket No. [OCC–2025–0142])

Dear Chairman Hill and Comptroller Gould:

We appreciate the opportunity to comment on the Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency's proposal to formally remove reputation risk from their supervisory programs. *See Prohibition on Use of Reputation Risk by Regulators*, 90 Fed. Reg. 48825 (Oct. 30, 2025). In our "dual banking system," *Watters v. Wachovia Bank, N.A.*, 550 U.S. 1, 15 n.7 (2007), States work as partners with the federal government to regulate the safety-and-soundness of the nation's banks, *Lewis v. BT Inv. Managers, Inc.*, 447 U.S. 27, 38 (1980). We thus have a significant interest in safeguarding regulated entities from damaging supervision.

We strongly support the proposed rule. Reputation risk is nowhere to be found in the federal banking statutes, which authorize supervision based on safety-and-soundness—not public opinion or political sentiment. *See* 12 U.S.C. § 1831p-1 (safety and soundness standards). And Congress

omitted this "risk" for good reason. The concept is subjective, and regulators have applied it inconsistently. It also can be employed to inappropriately compel financial institutions to cut off access to religious groups, political organizations, and lawful industries based on nothing more than political disfavor. The Proposed Rule correctly seeks to end this pernicious brand of regulatory supervision.

BACKGROUND

Safety and soundness supervision targets banking practices that directly endanger the health of a financial institution.

To constitute an unsafe or unsound practice, the "act must pose an abnormal risk to the financial stability of the banking institution." *In re Seidman*, 37 F.3d 911, 928 (3d Cir. 1994); *see also, e.g.*, *First Nat'l Bank of Bellaire v. Comptroller of Currency*, 697 F.2d 674, 685 (5th Cir. 1983) ("Unsafe and unsound banking practices encompass what may be generally viewed as conduct deemed contrary to accepted standards of banking operations which might result in abnormal risk or loss to a banking institution or shareholder." (cleaned up)); *see* also Heidi Mandanis Schooner, *Fiduciary Duties' Demanding Cousin: Bank Director Liability for Unsafe or Unsound Banking Practices*, 63 GEO. WASH. L. REV. 175, 194-95 (1995) (construing cases to say that safety and soundness does not "provid[e] the federal banking agencies with unlimited power to restrict any otherwise-lawful activities of the institution").

Congress did not intend the power to regulate safety and soundness to be an "overly broad delegation of power to administrative agencies." 112 CONG. REC. 24,984 (1966) (statement of Cong. Patman). Rather, it is a tool "relate[d] strictly to the insurance risk and to assure the public of sound banking facilities." *Id.*; *see also, e.g.*, Lawrence G. Baxter, *Fiduciary Issues in Federal Banking Regulation*, 56 LAW & CONTEMP. PROBS. 7, 27 (1993) ("Congress has always assumed that the safety/soundness principle took care of actions carrying risks of insolvency.").

Although safety-and-soundness supervision is not then meant to make regulators the "proctor[s] for public opinion," *Gulf Fed. Sav. & Loan Ass'n of Jefferson Par. v. Fed. Home Loan Bank Bd.*, 651 F.2d 259, 265 (5th Cir. 1981), regulators have used reputation risk as a means to play that role in everything but name. The concept is relatively new. Bank regulators first began using it in their supervision of financial institutions during the mid-1990s. Julie A. Hill, *Regulating Bank Reputation Risk*, 54 GA. L. REV. 523, 543 (2020). But once it came into vogue, reputation risk soon became "ubiquitous" in regulatory guidance. *Id*. at 549.

Before long, regulators began expanding reputation risk to embrace any "negative public opinion" arising from banks' interactions with third parties.[*] FED. DEPOSIT INS. CORP., FIL-44-2008, THIRD-

[*] This focus on relationships with third parties distinguishes the regulatory concept of reputation risk from actual financial risks arising from loss of public confidence in a bank's safety and soundness. Widespread depositor fear can trigger bank runs and liquidity crises—genuine threats to institutional stability. But regulators have untethered reputation risk from any such concrete financial harm, confusing material depositor fear with marginal public disfavor.

PARTY RISK GUIDANCE FOR MANAGING THIRD-PARTY RISK (2008), https://perma.cc/EL8D-GMYZ. The doctrine swept in "[t]hird-party relationships that result in dissatisfied customers, interactions not consistent with institution policies, inappropriate recommendations, security breaches resulting in the disclosure of customer information, and violations of law and regulation." *Id.* This broad standard required extraordinarily little for a third party to be classed as a reputational risk. And supervisors often adopted reputation risk through guidance—perhaps without even notice and comment—which invited malleability and excess discretion in enforcement.

Sure enough, regulators have initiated plenty of formal enforcement actions against banks based (at least in part) on perceived reputation risks. *See* Hill, *supra*, at 563-68 (discussing formal enforcement actions); *Bank of Agric. & Commerce Stockton, California*, FDIC Order No. FDIC-08-408b (Feb. 19, 2009) (order to cease and desist). Regulators are, after all, largely "insulated from judicial supervision." *Advance Am. v. FDIC*, No. CV 14-953, 2017 WL 2672741, at *12 (D.D.C. Feb. 23, 2017). Even in cases where "[a] bank may be able to successfully appeal such an enforcement action, … not all banks will have the resources or stomach for a protracted legal battle with regulators that are constantly supervising the bank." *See* Hill, *supra*, at 561.

Under such a reputation-risk-based regime, banks will often take an overly cautious approach by simply refusing to do business with customers that might raise the regulator's ire. After all, banks are subject to regular agency examinations and "consider it important to stay on the agencies' good side." Nicholas R. Parrillo, *An Empirical Study of Agencies and Industries*: *Federal Agency Guidance and the Power to Bind*, 36 YALE J. ON REG. 165, 192-94 (2019). "[S]ensitivity to [regulatory] guidance is an important part of that." *Id.* So even when reputation risk doesn't rear its head in a formal enforcement action, "it is likely that the deluge of ostensibly unenforceable reputation risk guidance operates as de facto reputation risk enforcement" that burdens banks and consumers alike. Hill, *supra*, at 580.

More recently, though, the industry has seen a welcome retreat from the concept of reputation risk. President Trump issued an executive order this summer directing federal banking regulators to "remove the use of reputation risk or equivalent concepts that could result in politicized or unlawful debanking." Exec. Order No. 14331, 90 Fed. Reg. 38705, 38925-27 (Aug. 12, 2025). And the OCC and FDIC have already undertaken efforts to remove reputation risk from their supervisory frameworks. 90 Fed. Reg. at 48827; *see also* FED. DEPOSIT INS. CORP, FIL-46-2025, AGENCIES ISSUE PROPOSAL TO PROHIBIT USE OF REPUTATION RISK BY REGULATORS; FDIC REMOVES REFERENCES TO REPUTATION RISK FROM EXAMINATION AND OTHER MATERIALS (2025), https://bit.ly/4jfmeLI.

The Proposed Rule thus continues the step-back from an ill-founded concept by formalizing the withdrawal of the factor from supervisory standards. That the regulators are taking this action through formal rulemaking—rather than more "guidance"—is especially welcome.

DISCUSSION

Keeping reputation risk in the FDIC and OCC's regulatory frameworks imposes an excessive cost for little benefit. Reputation risk is a wholly subjective measure, and agency enforcement based on reputation risk is without clear authority or standards. This subjectivity invites abuse, as experience shows. And it is unnecessary to separately evaluate reputation risk considering how traditional risk factors like operational risk or credit risk capture actual threats to institutional stability. At the same time, reputation risk complicates and weakens the States' own ability to regulate financial institutions. Overall, the Proposed Rule correctly and admirably protects banks and banking consumers from arbitrary enforcement and politically motivated debanking while restoring States' discretion, too.

I. Reputation risk is too subjective for examiners to enforce fairly or consistently.

Reputation risk injects substantial uncertainty into the bank regulators' supervisory framework. Unlike traditional risk factors, reputation risk "lacks objective metrics and has historically relied heavily on examiner judgement." *The New Rules of Reputational Risk in US Banking*, REGTECH ANALYST (Dec. 11, 2025), https://perma.cc/28ZY-SHK9. It is "difficult to accurately measure." Todd Haugh & Suneal Bedi, *Valuing Corporate Compliance*, 109 IOWA L. REV. 541, 563 (2024). Even scholars who have attempted to develop qualitative methods have defaulted to subjective metrics in their measure of reputation risk, such as whether the bank engages with "controversial clients." Ezelda Swanepoel, Jánel Esterhuysen, Gary van Vuuren & Ronnie Lotriet, *Assessing Reputational Risk: A Four Point Matrix*, 10 J. OF ECON. AND FIN. SCI. 313, 322 (2017).

Because regulators lack any method to consistently supervise reputation risks, individual stakeholders, "customers, counterparties, correspondents, investors, *regulators*, employees, and the community" become the arbiters of reputation risk. OFF. OF THE COMPTROLLER OF THE CURRENCY, COMPTROLLER'S HANDBOOK: BANK PREMISES AND EQUIPMENT BOOKLET 4 (2018), https://bit.ly/4jfzShV; *see also* Hill, *supra*, at 535 ("Reputation risk, then, is the risk that 'stakeholders [will negatively] change their expectations and behaviors.'" (citation omitted)). Yet it is impossible for banks to cater to every stakeholder's perception of what constitutes a reputation risk. *See, e.g.*, Eric Wischman, *Climate risk: Threading the needle*, ABA BANKING JOURNAL (May 2, 2024), https://tinyurl.com/ypver27d (describing how many stakeholders have different "strong views" on climate change). Mere association with third parties facing "any negative publicity"—no matter whether that bad publicity is justified—also falls under the broad reputation risk umbrella. FDIC, FIL-44-2008, *supra*. And regulators have considered reputation risk to be "inherent in all bank activities." OFF. OF THE COMPTROLLER OF THE CURRENCY, COMPTROLLER'S HANDBOOK: BANK SUPERVISION PROCESS 28 (Sept. 2019 ed. 2018), https://perma.cc/SV5B-YYUC.

Taken together, these realities mean the realm of potential risks becomes intolerably broad. It also becomes divorced from the traditional focus on *material*, abnormal risk. Regulatory oversight of reputation risks descends into regulatory dysfunction and inconsistent enforcement. None of these results align with the regulators' traditional authorities. *See* 12 U.S.C. § 1831p-1. Nor are they

even consistent with ordinary principles of administrative law, which require that agencies at least provide a "clear and coherent explanation" for the matters they set out to regulate. *Tripoli Rocketry Ass'n, Inc. v. ATF*, 437 F.3d 75, 81 (D.C. Cir. 2006); *see also, e.g.*, *FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 254 (2012) (administrative actions are unjustifiably vague when they "fail[] to provide a person of ordinary intelligence fair notice of what is prohibited" (citation omitted)).

Banks and banking consumers deserve fair and consistent enforcement. Reputation risk is too subjective for that to be possible. Even proponents admit that "[r]eputational risk is admittedly hard to quantify." Dru Stevenson, *Operation Choke Point: Myths And Reality*, 75 ADMIN. L. REV. 317, 358 (2023). Once reputation risk is taken out of the equation, regulatory supervision will be a much more precise endeavor, looking more to generally accepted banking practices rather than the political winds of the time. But if reputation risk stays, banks and banking consumers remain at the mercy of regulators' subjective judgments and individual examiners' whims.

II. Reputation risk invites government-backed, politicized debanking.

The dysfunction described above has predictable—and documented—consequences. Reputation risk's subjective nature opens the door for regulators to pressure banks to debank politically disfavored consumers. Even in its best light, "the current reputation risk framework encourages regulators to regulate banks based on regulators' uncertain forecasts of negative publicity." *See* Hill, *supra*, at 602. This framework provides "regulators cover for implementing their own political agenda unrelated to the safety or soundness of banks." *Id.* No wonder, then, that past administrations have done just that.

Operation Choke Point and Operation Choke Point 2.0—initiatives by the Obama and Biden administrations—are notable and unfortunate examples.

Despite claiming to target "mass-market consumer fraud," Operation Choke Point tried to "choke[]-off" banking access for short-term lenders and other politically disfavored but often legitimate industries. STAFF OF H. COMM. ON OVERSIGHT & GOV'T REFORM, 113TH CONG., THE DEPARTMENT OF JUSTICE'S "OPERATION CHOKE POINT": ILLEGALLY CHOKING OFF LEGITIMATE BUSINESSES? 4-8 (Comm. Print 2014), https://perma.cc/25VN-WBBB. Banks heard the FDIC loud and clear: either terminate business relationships with politically disfavored industries or face increased regulatory scrutiny and penalties. *Id.* at 9; *see also* OFF. OF INSPECTOR GEN., FED. DEPOSIT INS. CORP., AUD-15-008, THE FDIC'S ROLE IN OPERATION CHOKE POINT AND SUPERVISORY APPROACH TO INSTITUTIONS THAT CONDUCTED BUSINESS WITH MERCHANTS ASSOCIATED WITH HIGH-RISK ACTIVITIES 33-34 (2015), https://bit.ly/3Yc37Zj (reporting multiple banks felt pressured by the FDIC to end relationships with designated "high-risk" industries).

Legality didn't matter. Providing "normal banking services to certain merchants" designated as "high-risk" "create[d] a reputational risk" in the eyes of regulators. H. COMM. ON OVERSIGHT & GOV'T REFORM, *supra*, at 8 (cleaned up); *see generally* MICHAEL B. BERNARDO, KATHRYN M. WEATHERBY & ROBERT J. WIRTZ, FED. DEPOSIT INS. CORP., *Managing Risk in Third-Party Payment Processor Relationships*, *in* 8 SUPERVISORY INSIGHTS 1, 3-12 (2011), https://perma.cc/G4Q2-RT45. At the same time, unlawful but politically favored businesses like

the marijuana industry were *not* targeted. H. COMM. ON OVERSIGHT AND GOV'T REFORM, *supra*, at 2-3. So banks were put "in an unenviable position: discontinue longstanding, profitable relationships with fully licensed and legal businesses, or face a potentially ruinous lawsuit by the Department of Justice." *Id.* at 8-9; *see, e.g., Cmty. Fin. Servs. Ass'n of Am., Ltd. v. Fed. Deposit Ins. Corp.*, 132 F. Supp. 3d 98, 110-11 (D.D.C. 2015) (concluding plaintiff's claims that regulators used backdoor tactics to pressure regulators into cutting ties with payday lenders were sufficient to survive pleadings stage).

Similar tactics were deployed against digital asset firms in a Biden-era initiative commonly known as "Operation Choke Point 2.0." STAFF OF H. COMM. ON FIN. SERVS., 119TH CONG., OPERATION CHOKE POINT 2.0: BIDEN'S DEBANKING OF DIGITAL ASSETS (Comm. Print 2025), https://perma.cc/J6JD-AR5K. Regulators pressured financial institutions to debank digital asset companies using various methods, including by "sending dozens of letters to senior members of financial institutions directing them to 'pause all crypto asset-related activity' regardless of type or materiality with unspecified timelines for agency review." *Operation Choke Point 2.0: The Biden Administration's Efforts to Put Crypto in the Crosshairs: Hearing before the Subcomm. On Oversight & Investigations of the H. Comm. On Financial Serv.*, 119th Cong. 1 (2025) (testimony of Mr. Paul Grewal, Chief Legal Officer, Coinbase), https://perma.cc/594E-Z48A. These efforts worked. Operation Choke Point 2.0 ultimately "resulted in the debanking of at least 30 entities and individuals engaging in digital asset-related activities. H. COMM. ON FIN. SERVS., *supra*, at 1.

Reputation risk provided the regulatory cover for these actions—allowing agencies to target lawful industries without pointing to concrete financial instability. Even the most vehement defenders of the Choke Point operations have been forced to acknowledge such a "categorical or broad-brush approach … could be overinclusive." Stevenson, *supra*, at 341. But these initiatives were almost inevitable as "natural outgrowth[s] of a regulatory structure that sees reputation risk everywhere." Hill, *supra* at 602.

But the two Choke Points were not isolated events; once regulators opened the door for political debanking, no one was immune. Banks have restricted access to financial services for political action committees and parties. OFF. OF THE COMPTROLLER OF THE CURRENCY, PRELIMINARY FINDINGS FROM THE OCC'S REVIEW OF LARGE BANKS' DEBANKING ACTIVITIES 3 (2025), https://perma.cc/76VN-DBAF. New York financial services regulators weaponized perceived "reputational risks" to pressure insurers and financial service institutions into severing business ties with the National Rifle Association—conduct the Supreme Court unanimously held plausibly alleged a First Amendment violation. *Nat'l Rifle Ass'n of Am. v. Vullo*, 602 U.S. 175, 194 (2024). Religious groups aren't safe, either: banks have terminated the accounts of Christian ministries and charities. *See, e.g.*, Jamie Joseph, *Christian nonprofit claims it was 'debanked' by Bank of America over its religious views*, FOX NEWS (Aug. 25, 2023, 2:25 p.m. EDT), https://bit.ly/3YMEp1G. The list of other targets engaged in lawful conduct is long; firearms dealers, small businesses, and others have fallen victim to debanking practices instigated by illusory reputational risk concerns. *See* Adonis Hoffman, *Debanking innocent Americans should be illegal*, THE HILL (July 13, 2025), https://tinyurl.com/mr2s5c4z.

The coal, oil and gas industries have felt the particular brunt. Many large banks have restricted or cut off access to financial services for coal-powered energy generation and oil and gas development in the Arctic. *See* PRELIMINARY FINDINGS FROM THE OCC'S REVIEW OF LARGE BANKS' DEBANKING ACTIVITIES, *supra*, at 2. Regulators set the stage for targeting these industries. One Kentucky resident who leased land to coal producers was informed by his long-time bank that, following "pressure from bank regulators," it would stop doing business with him if he continued leasing to coal producers. *The Department of Justice's "Operation Choke Point": Hearing before the Subcomm. on Oversight & Investigation of the H. Comm. on Fin. Servs.*, 113th Cong. 29-30 (2014) (statement of Rep. Andy Barr), https://perma.cc/RU6L-8WJ7. And up until this year, guidance from the Office of the Comptroller of the Currency cautioned that "[l]ending to companies found or perceived by the public to be negligent in preventing environmental damage, hazardous accidents, or weak fiduciary management can damage a bank's reputation." OFF. OF THE COMPTROLLER OF THE CURRENCY, COMPTROLLER'S HANDBOOK: OIL AND GAS EXPLORATION AND PRODUCTION LENDING 17 (Oct. 2018 ed. 2016), https://perma.cc/EU9Y-FALU. It didn't matter that "[o]ver the years, the [oil and gas] industry has achieved high technical and safety standards." *Id.*

Once regulators remove reputation risk from the equation, banks will be much less inclined to lean on subjective moral or political judgments when deciding whether to terminate customer accounts. *See* Hill, *supra*, at 532-34 (explaining how regulatory guidance encourages banks to focus on eliminating perceived reputation risks). Banks, after all, focus great attention on regulatory guidance. And regulators should turn their attention to what really matters: objective risk measures related to the safety and soundness of banking institutions. To the extent reputation risk might hurt a bank's bottom-line, simple financial motivation should compel them to act. Banks should compete for customers based on business judgment, not regulatory favoritism toward politically preferred industries.

III. Reputation risk undermines the dual banking system.

Our dual banking system reflects a balance between federal and state regulation carefully calibrated by Congress. *See, e.g., Lincoln Sav. & Loan Ass'n v. Fed. Home Loan Bank Bd.*, 856 F.2d 1558, 1562 (D.C. Cir. 1988). Indeed, banks are "subject to the laws of the State, and are governed in their daily course of business far more by the laws of the State than of the nation." *First Nat. Bank v. Commonwealth of Kentucky*, 76 U.S. 353, 362 (1869). State and federal regulators are supposed to work as partners, sharing responsibility for ensuring the safety and soundness of financial institutions. This cooperative arrangement depends on clear, predictable regulatory standards that both sovereigns can consistently apply.

Yet because reputation risk is inherently subjective and lacks objective metrics, state regulators cannot anticipate when federal examiners might invoke it against state-chartered banks. A bank conducting business with a firearms dealer, coal company, or cryptocurrency firm might pass state examination but face federal scrutiny based on unpredictable reputation risk assessments. This uncertainty frustrates state supervisory efforts and undermines the reliability of state examinations. State regulators are left to guess which customer relationships or business activities might trigger federal concerns.

Worse still, reputation risk allows federal regulators to effectively override state policy judgments about which industries merit banking access. States license and authorize firearms dealers, payday lenders, energy producers, and many other lawful businesses to operate within their borders. These licensing decisions reflect state policy choices about legitimate commerce. *See Great Atl. & Pac. Tea Co. v. Grosjean*, 301 U.S. 412, 425-26 (1937) (explaining that a State retains police power to "forbid, as inimical to the public welfare, the prosecution of a particular type of business, or regulate a business in such manner as to abate evils deemed to arise from its pursuit"). When federal regulators pressure banks to terminate relationships with state-licensed industries based on amorphous reputation concerns, they nullify those state determinations. Indeed, federal efforts could directly *contradict* state fair access laws that punish debanking efforts. *See* Jonathan R. Kolodziej & Stephen Parsley, *State Laws Show Uniformity Is Key To Truly Fair Bank Access*, BRADLEY (Aug. 14, 2025), https://tinyurl.com/yust2php.

Congress has authorized federal banking regulators to supervise the safety and soundness of insured institutions. *See* 12 U.S.C. § 1831p-1. That statutory mandate does not extend to dictating which businesses—authorized (and sometimes endorsed) by state law—should have access to banking services based on political considerations. When federal regulators invoke reputation risk to target industries disfavored at the national level but welcomed at the state level, they undermine state sovereignty.

The Proposed Rule restores a better balance. It will allow federal regulators to continue supervising institutional stability using more objective, financially grounded risk metrics. States will retain authority over commercial licensing and policy choices within their borders. And both sovereigns will benefit from clearer, more predictable supervisory standards that facilitate rather than frustrate cooperative regulation. Indeed, we think that benefits of removing reputation risk are great enough that the agencies should foreclose consideration of reputation risks *in toto*. Agencies should bar any direction of adverse action "on the basis of the third party's involvement in politically disfavored but lawful business activities," not just actions "solely on the basis" of those activities. 90 Fed. Reg. at 48827.

CONCLUSION

The agencies are right to propose eliminating reputation risk from their supervisory frameworks. This concept lacks statutory foundation, defies consistent application, chill constitutionally protected speech, and enables political interference in lawful commerce. And beyond the legal and fairness concerns we described, arbitrary debanking chokes off credit availability and stifles economic activity. When lawful businesses lose banking access based on regulatory whim rather than financial risk, investment dries up, jobs are lost, and innovation suffers. These harms are felt not just in the targeted industries but across entire state economies.

Removing reputation risk from the regulatory framework will restore proper focus to what matters: protecting institutional safety and soundness through objective, measurable risk assessment. Banks will operate under clearer standards. Consumers engaged in lawful activity will have fair

access to financial services. And state and federal regulators can supervise based on genuine financial risk rather than political winds.

We strongly support the Proposed Rule and urge its prompt adoption.

Sincerely,

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