



April 4, 2020

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

The Honorable Jelena McWilliams, Chair
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429-0002

RE: Docket ID OCC-2018-0008; RIN 1557-AE-34, 3064-AF22; - Reform of the
Community Reinvestment Act

Dear Comptroller Otting and Chair McWilliams:

We are real estate agents serving the state of Maryland and have over 24 years of real estate experience. We work closely with NHS of Baltimore, a NeighborWorks organization. Many of our clients receive financial coaching and homebuyer education at NHS Baltimore. Our clients also utilize many of the incentive programs they offer. We have helped hundreds of clients in LMI communities over the years and have seen how CRA has assisted many of them with their home purchase. Many large banks needing to meet CRA ratings have created purchase programs in the past to assist LMI buyers to purchase homes. Some of these programs allowed higher debt to income, lower credit scores, down payment assistance, etc. Some of these institutions while having these programs in place, did not make the home buying process an easy one for LMI buyers. It seemed at times that they looked for every reason not to give a loan and felt that they were forced to do it. We do not believe the CRA guidelines should be amended for banks. We feel that allowing banks to pass their CRA exams while failing in half of their assessment areas, or to allow banks to get credit for activities done anywhere, would allow them to do even less than what they are doing now. We have seen recently lenders not wanting to do deals under a certain dollar amount and this could be taken even further with the proposed changes. All lenders should be CRA compliant not just large banks. We feel everyone, everywhere deserves the opportunity of homeownership.

Sincerely yours,

Naji & Sherrie Rashid Owner/ CMO

1st Advantage Real Estate Services

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