



# LEGISLATIVE OUTREACH

Community Bankers Association of Illinois  
*Department of Governmental Relations*

## **CBAI ACTION ALERT: Urge CFPB to Exempt Community Banks from the Payday Lending Rules**

The Community Bankers Association of Illinois (CBAI) is calling on all Illinois community bankers to urge the Consumer Financial Protection Bureau (Bureau) to provide community banks with a broad exemption from their proposed payday, vehicle title, and certain high-cost installment-lending rules. Your response to this Action Alert will support CBAI's call to broadly exempt community banks in its extensive comment letter on your behalf.

### **Please respond by Friday, October 7, 2016!**

There are three different ways you can respond to this Action Alert depending on the time you have available.

1. The pre-drafted email states in the text box, "CFPB-2016-0025 would adversely impact the customers of my community bank." which clearly registers your opposition to the proposed rules. [Please Take Action Now!](#)
2. You may delete the sentence in the text box and cut-and-paste the following statement which provides the Bureau with a more complete explanation of the harm to customers and community banks from implementing their proposed rules. [Please Take Action Now!](#)

Dear Ms. Jackson:

I urge the Consumer Financial Protection Bureau (Bureau) to direct the proposed rules at those that abuse consumers with unfair and deceptive practices and not community banks that treat their customers and communities fairly and with respect. The proposed rules will harm my community bank's ability to continue to offer small-dollar consumer loans and we would likely have to stop offering this type of loan, harming our customers.

**I urge you to broadly exempt community banks by establishing a minimum \$10-billion-asset exemption threshold.** An asset exemption was inherent in the very law creating the Bureau itself and has been used by the Bureau and other regulators to tailor regulations for community banks. These exemptions have been granted in recognition of the unique nature of community

banks and the different business model and risks they pose to consumers, the financial system and the economy. This exemption should also be granted in an effort to maintain and enhance the ability of community banks to meet the small-dollar consumer lending needs of their customers.

Thank you for considering my recommendation.

3. We are particularly interested in you telling the Bureau precisely how restricting your community bank's ability to offer small-dollar consumer loans will impact your customers and communities. If you have time, and the information is available, please give the Bureau specific examples of harm. [\*\*Please Take Action Now!\*\*](#)

**Please share this Action Alert with your board members and senior management.**

**A strong response from Illinois community bankers will make an impact.**

**Thank you in advance for responding!**

October 4, 2016