



Virginia Poverty Law Center

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November 27, 2007

Office of the Comptroller of the Currency, Treasury
Board of Governors of the Federal Reserve System
Federal Deposit Insurance Corporation
Office of Thrift Supervision
The National Credit Union Administration

Re: Proposed regulations regarding garnishment of exempt federal benefit funds
Docket No. OP-1294

I submit these comments as Executive Director of the Virginia Poverty Law Center. I agree with the analysis of the National Consumer Law Center who submitted comments earlier today.

I would like to emphasize that we have attempted for several years to get the banks in Virginia to voluntarily stop this practice of automatically freezing bank accounts that have been garnished even if the funds are exempt. The majority of banks in Virginia have refused to take any action to stop this practice and have been unwilling to discuss ways to alleviate the hardship this has caused.

I have represented clients for twenty years with this problem and it has only gotten worse. We know that for every client that comes to legal aid and asks for help to get her bank account unfrozen, there are probably several people that take no action and lose their Social Security or other funds that they depend upon. This is a tragedy that must be stopped.

Sincerely

James W. (Jay) Speer
Executive Director