



**Community Development Investment Letter #2018-1**  
**March 2018**

January 30, 2018

Mr. Michael Bailey  
American First National Bank  
9999 Bellaire Blvd.  
Houston, TX 77036

Dear Mr. Bailey:

This letter responds to the prior approval request from American First National Bank (the "Bank") that the Office of the Comptroller of the Currency (the "OCC") received on January 8, 2018. The Bank would like to make an investment of \$150,000 in the OTR Fund I LLC (the "Fund") under the requirements of 12 USC § 24 (Eleventh) (the "Statute") and 12 CFR Part 24 (the "Regulation") concerning national bank community and economic development entities, community development projects, and other public welfare investments.

The Bank's proposal represents that its investment in the Fund will primarily benefit low- and moderate-income individuals and would be considered a "qualified investment" under 12 CFR 25.23 for purposes of the Community Reinvestment Act. The Fund will utilize the investment to finance a non-profit, On the Road Lending, that offers automobile financing, financial education, and car maintenance training to low- and moderate-income ("LMI") individuals seeking to purchase newer-model vehicles. The non-profit seeks to help LMI persons who lack reliable and fuel-efficient vehicles by making affordable financing, financial education, and car maintenance training available to them. The Fund is a Community Development Financial Institution ("CDFI") certified by the U.S. Department of Treasury's ("Treasury") CDFI Fund.

The Bank indicates that the aggregate amount of its public welfare investments and outstanding commitments, including the investment that is the subject of this application, will be less than [ ] percent of its capital and surplus. In addition, the Bank represents that the investment would not expose the Bank to unlimited liability.

Based on the information provided by the Bank, we agree that the Bank's investment in the Fund complies with the public welfare requirement of 12 CFR 24.3 and is approved. The Bank must seek prior written approval from the OCC if its aggregate outstanding investments and commitments under the Regulation are 5 percent or greater of its capital and surplus. In no event may the Bank's aggregate investments and commitments under the Regulation and Statute exceed 15 percent of its capital and surplus. Further, the Bank shall not make an investment that would subject the Bank to unlimited liability, as prohibited by 12 CFR 24.4(b).

The Bank shall maintain in its files information adequate to demonstrate that its investment in the Fund meets the requirements of the Regulation and Statute, including the public welfare purpose, as set out in 12 CFR 24.3.

The response set forth in this letter is based on information and representations provided to us by the Bank. Any change in the nature, amount, or purpose of the Bank's investment could result in a different response being rendered concerning the conformance of the Bank's investment with the Statute and the Regulation. If, at any time, the Treasury does not recertify the Fund as a CDFI or the Fund loses that certification, the, Bank shall immediately notify the OCC in writing of this development, and submit reports to the OCC concerning this investment in the Fund.

This response regarding the Bank's Part 24 investment and activities, and communications by OCC employees in connection with this filing, do not constitute a contract, express or implied, or any other obligation upon the OCC, the United States, or any agency or entity of the United States, or an officer or employee of the United States. This response does not affect the ability of the OCC to exercise its supervisory, regulatory, and examination authorities under applicable laws and regulations. The foregoing may not be waived or modified by any employee or agent of the OCC or the United States.

If you have questions regarding this letter, please feel free to contact me at (202) 649-6420. You may also access general information about the national bank community development investment authority under Part 24 at [www.occ.gov/pwi](http://www.occ.gov/pwi).

Sincerely,

/s/

Barry R. Wides  
Deputy Comptroller  
Community Affairs