

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

COMMUNITY FINANCIAL SERVICES  
ASSOCIATION OF AMERICA, LTD., et al.,

Plaintiffs,

v.

FEDERAL DEPOSIT INSURANCE  
CORPORATION, et al.,

Defendants.

Civil Action No. 14-953-GK

**DECLARATION OF WILLIAM S. LANE**

Pursuant to 28 U.S.C. § 1746 and LCvR 11.2, I hereby declare as follows:

1. My name is William S. Lane. I am a certified public accountant. I am above 18 years of age and am competent to make this declaration.
2. Since 2002 I have been employed as the Chief Financial Officer of Check into Cash, Inc. and its various affiliates (collectively, the "Company"). My office is located at the Company's headquarters in Bradley County, Tennessee.
3. As the Company's Chief Financial Officer, I have had significant and regular contact with several of the banks with whom the Company has done business for over 15 years
4. Beginning in approximately October, 2013 and continuing through the present, several banks have notified the Company that they would no longer provide banking services to the Company. There was a fairly consistent feel to the termination notices, as time after time our longtime contacts, with whom we had enjoyed good relationships, indicated that they were unable to provide any details about why the bank was discontinuing services to the Company.

5. Banks that discontinued services to the Company include the following:
  - a. Bank of America, by notice dated October 30, 2013;
  - b. JP Morgan Chase, by notice dated November 12, 2013;
  - c. Whitney National – Hancock Bank, by notice dated February 26, 2014;
  - d. Fifth Third Bank, by notice dated March 5, 2014;
  - e. Capital One Bank, by notice dated March 27, 2014;
  - f. US Bank, by notice dated November 10, 2016;
  - g. Main Source Bank, Indiana, by notice dated December 7, 2016.

6. On December 21, 2016 I had a telephone conversation with an individual that I know to be a Senior Vice President at a large bank with a multistate footprint (“Bank 1”). This Bank 1 employee told me that (i) the decision to cease doing business with the payday industry was not Bank 1’s decision and (ii) at the time Bank 1 was instructed to exit the payday business it was also instructed to stop servicing companies in the firearms and student loan businesses.

7. On January 4, 2017 I had a telephone conversation with an individual that I know to be a Senior Vice President at another large bank with a multistate footprint (“Bank 2”). I told this Bank 2 employee that we at the Company had always assumed the exits from our industry by the likes of Bank of America, JP Morgan Chase, Fifth Third Bank and others was a direct result of Operation Chokepoint. In response, this Bank 2 employee said “Well it was Chokepoint for us.”

8. I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
William S. Lane

1/9/17  
\_\_\_\_\_  
Dated