

**Briefly describe your complaint. Use chronological order, by dates. Include copies of any contracts, sales slips, canceled checks, correspondence or supporting documents.**

We are Bob Phillips and Steve Happ, Board members of Indigenous Advance Ministries, formerly World Shine USA. Bob Phillips is the current chair of the Board of Trustees and Steve Happ is a current Board member and founder of Indigenous Advance. Indigenous Advance is a Memphis-based charity that, along with Indigenous Advance Customer Center LLC, advances indigenous Christian ministries in Uganda to impact the world with the gospel of Jesus Christ. Our website is available at <https://indigenousandvance.org>. We partner with Ugandan ministries to provide basic necessities for orphaned and vulnerable children, educate vulnerable children and prisoners, raise Christian families, and provide other essential services for Ugandans. Indigenous Advance has operated since 2015 and used Bank of America for our banking services from that time until recently.

On April 27, 2023, we received a letter from Bank of America dated April 24, 2023. It stated that "we've made the decision to restrict your deposit account ending in [redacted] in the next 21 days, and close it within 30 days from the date of this letter." We received two similar letters, also dated April 24, stating that they were closing our credit cards. The only explanation the letters gave was that "upon review of your account(s) we have determined you're operating in a business type we have chosen not to service at Bank of America." Our deposit account had over \$270,000. We asked the Bank repeatedly for an explanation, but they would only repeat what the letter said, that they would no longer serve our type of business. Our partner entity, Indigenous Advance Customer Center, LLC, and a church operating at our address, Servants of Christ Community dba University House of Prayer (UHOP), received similar letters closing their accounts.

In response, and to avoid the significant damage that would be caused by a disruption of services, we quickly opened accounts at a different bank.

One month later, we received a follow-up letter dated May 24 that told us, "after a careful review of your banking relationship, we closed this account, as well as your corporate business card relationship and associated accounts because your risk profile no longer aligns with the bank's risk tolerance." The letter did not elaborate on why we were a supposed risk. We asked for an explanation of this letter too but were not given one.

Being forced to transition so quickly caused a great deal of trouble for us. We had to find another bank and open new accounts and adjust our payroll, accounting, accounts payable and receivable, and other parts of our business. It also disrupted our mission trip to Uganda in June and we were temporarily unable to pay salaries in Uganda. And we were left very confused. We have never had any financial issues with Indigenous Advance and we do not donate to or otherwise advocate for any political causes, domestic or international. And our mission and work, supporting Ugandan children and families through indigenous Ugandan ministries, has remained the same since we were founded and first opened our accounts with Bank of America.

I am concerned that Bank of America cancelled our and our partners' accounts because it disagrees with our religious views. If so, this could violate consumer protection or other laws. Bank of America's Code of Conduct, <https://investor.bankofamerica.com/corporate-governance/governance-library/code-of-conduct>, says that it promotes "diversity and inclusion" with respect to religion, among other categories, and that every decision concerning customer accounts must reflect this inclusivity. Code of Conduct at 10, 35. But discriminating against us for our religious mission would seem to go against this promise.

Discrimination may also be an unfair practice under Tennessee's consumer protection law; we cannot reasonably anticipate that Bank of America would seemingly act against their own self-interest by discriminating against us for our religious views.

Attached are the account closure letters and the last bank account statement for our Bank of America deposit account. We do not have a copy of the original terms of service but on information and belief we signed the standard banking service agreement for Bank of America available in 2015. We are happy to provide any other information on request.

Sincerely

A handwritten signature in blue ink, appearing to be 'BP', written over a horizontal line.

Bob Phillips

A handwritten signature in blue ink, appearing to be 'SH', written over a horizontal line.

Steve Happ