

**David Pommerehn, Who Serves As General Counsel And Senior Vice President At The Consumer Bankers Association (CBA), Defended Overdraft Services By Saying That Restricting It Would "Adversely Affect" Banks, While Donating \$29,900 To The CBA PAC—Which Has Given At Least \$105,000 To Conservative Members Of The Subcommittee On Financial Institutes And Consumer Protection.**


**David Pommerehn, Who Will Serve As Witness At An Upcoming Senate Banking Subcommittee Hearing, Serve As General Counsel And Senior Vice President At Consumer Bankers Association, Which A Trade Association For Retail Banks.**

**May 4, 2022: David Pommerehn Will Serve As A Witness At The Senate Banking Committee's Subcommittee Hearing On "Examining Overdraft Fees And Their Effects On Working Families."** [Senate Committee on Banking, accessed [04/29/22](#)]

**David Pommerehn Serves As General Counsel And Senior Vice President At The Consumer Bankers Association (CBA) Where He Covers "A Wide Range Of Legal, Legislative, And Regulatory Issues," Including "Deposits And Payment Issues" And "Small Business Banking Issues."** "David Pommerehn is General Counsel and Senior Vice President. His expertise covers a wide range of legal, legislative and regulatory issues associated with the areas of consumer financial services. He is the CBA lead for deposits and payment issues as well as small business banking issues and manages CBA's Deposits and Payments and Small Business Banking Committees." [Consumer Bankers Association, accessed [04/29/22](#)]

- **The CBA Is A "Member-Driven Trade Association" Focused On Retail Banking.** "The Consumer Bankers Association (CBA) is the only member-driven trade association focused exclusively on retail banking. Whether buying a home, financing an education or launching a small business, since 1919, our members have partnered with consumers to help them achieve the American dream." [Consumer Bankers Association, accessed [04/29/22](#)]

**Pommerehn Has Worked At The CBA Since 2013, Where He Has Served As Counsel In Various Capacities:**



**David Pommerehn**  
General Counsel, Senior Vice President at Consumer Bankers Association

**CBA Consumer Bankers Association**  
13 yrs 8 mos

- General Counsel, Senior Vice President**  
 Jan 2020 - Present · 2 yrs 4 mos  
 Washington, D.C.
- Senior Vice President, Associate General Counsel**  
 Nov 2018 - Jan 2020 · 1 yr 3 mos  
 Washington D.C. Metro Area
- Vice President, Associate General Counsel**  
 Dec 2016 - Jan 2020 · 3 yrs 2 mos
- Vice President, Senior Counsel**  
 Dec 2014 - Nov 2016 · 2 yrs  
 Washington D.C.
- Asst. Vice President and Senior Counsel**  
 May 2013 - Dec 2014 · 1 yr 8 mos  
 Washington, D.C.
- Counsel, Legislative and Regulatory Affairs**  
 Sep 2008 - May 2013 · 4 yrs 9 mos  
 Consumer Bankers Association, Arlington, VA  
 Counsel, Legislative and Regulatory Affairs, September 2008 – May 2013

[LinkedIn, accessed [04/29/22](#)]

**In 2019, Pommerehn Authored An Op-Ed In Which He Argued That Current Regulatory Mandates Protect Consumers While Defending Overdraft Services By Saying It Offered A "Source Of Financial Liquidity" For Consumers And Warning That Restrictions On Overdrafts Would "Adversely Affect" Banks.**

In 2019, David Pommerehn Authored An Op-Ed In *American Banker*: Policymakers Shouldn't Undermine Existing Overdraft Regulations. [American Banker, [07/18/19](#)]

In The Op-Ed, Pommerehn Argued That "Current Regulatory Mandates" Regarding Overdraft Services "Afford[ed] Consumers Strong Protections" And Called For Policy And Oversight That "Will Not Impede Banks' Ability To Offer A Variety Of Overdraft Payment Services." "The Consumer Financial Protection Bureau is currently reviewing the overdraft rules consistent with the Regulatory Flexibility Act. While the Consumer Bankers Association believes adjustments and clarifications to the rule may be warranted, the rule currently in place should largely remain the same. The current regulatory mandates concerning overdraft services afford consumers strong protections via detailed disclosures. The industry needs regulatory policy and oversight that will not impede banks' current ability to offer a variety of overdraft payment services in order to meet their customers' financial needs." [American Banker, [07/18/19](#)]

**Pommerehn Also Argued That Restricting Overdraft Services Would "Take Away A Well-Regulated Source Of Financial Liquidity" And Can Cause Consumers Harm.** "Placing restrictions on overdraft services would take away a well-regulated source of financial liquidity, causing consumer harm through returned payment fees, accumulation of higher merchant-imposed interest or late-payment penalties for returned checks." [American Banker, [07/18/19](#)]

**Pommerehn Defended Banks, Saying They Would Be "Adversely Affected Through The Loss Of Income" If Overdraft Services Were Restricted.** "The possible monetary and nonmonetary consequences of restricting overdraft services would be broad and complex for consumers, service providers and merchants. For consumers, restrictions on overdraft services would reduce access to valuable liquidity. Merchants and service providers would be adversely affected through loss of income from the sale of goods or services, and

incur higher costs as a result of returned payment items or disruption to their receivables cycle." [American Banker, [07/18/19](#)]

**Since 2010, Pommerehn Has Given \$29,000 To The Consumer Bankers Association's PAC—Which Is Used To Support Members Of Congress Who Value A "Healthy, Vigorous, And Robust Financial Industry"—And The CBA PAC Donated At Least \$105,000 To Conservative Members Of The Senate Banking Committee's Subcommittee On Financial Institutions And Consumer Protection.**

Since 2010, Pommerehn Has Given \$29,900 To The Consumer Bankers Association PAC:

Contributor	Recipient	Career Donations*
David Pommerehn	Consumer Bankers Association PAC	<a href="#">\$29,900</a>
Total:		<b>\$29,900</b>

**CBA's PAC Supports Members Of Congress "Who Understand The Importance Of A Healthy, Vigorous, And Robust Financial Industry."** "CBA's PAC money goes towards supporting those Members of Congress who understand the importance of a healthy, vigorous, and robust financial services industry." [Consumer Bankers Association, accessed [04/29/22](#)]

**The Consumer Bankers Association PAC Has Donated At Least \$105,000 To Conservative Members Of The Senate Banking Committee's Subcommittee On Financial Institutions And Consumer Protection.**

<a href="#">Financial Institutions and Consumer Protection Members</a>	Contributor	Career Donations*
Sen. Thom Tillis	Consumer Bankers Association PAC	<a href="#">\$26,000</a>
Sen. Richard Shelby	Consumer Bankers Association PAC	<a href="#">\$14,000</a>
Sen. Tim Scott	Consumer Bankers Association PAC	<a href="#">\$28,000</a>
Sen. Mike Rounds	Consumer Bankers Association PAC	<a href="#">\$5,000</a>
Sen. Jerry Moran	Consumer Bankers Association PAC	<a href="#">\$18,500</a>
Sen. Kevin Cramer	Consumer Bankers Association PAC	<a href="#">\$13,500</a>
Total:		<b>\$105,000</b>

\*Includes Donations To Affiliated Leadership PACs