



INSULATING A FINTECH-SERVING BANK FROM A COSTLY EXAMINATION

STATE OF PLAY

A leading bank serving financial technology (fintech) firms came under investigation by a prominent federal regulator for allegedly failing to properly monitor its relationships with fintech clients. The government's examination posed an existential threat to the bank because it was already subject to an earlier consent order with the regulator, meaning an additional enforcement action was likely to destroy its business. Narrative developed a comprehensive strategy to mitigate the regulatory threat while protecting the bank's reputation.

ACTION

- **Landscape Analysis & Scenario Planning.** Our team began by conducting a detailed scenario analysis, planning for outcomes ranging from minimal impact to the most detrimental, and crafted tailored communications strategies and messaging for each.
- **Third-Party Identification & Activation.** To influence public perception, Narrative engaged and educated a network of third-party surrogates, including influential voices who defended the bank and criticized the regulator's actions as overly aggressive. Senior leadership advanced messaging that likened the regulator's posture to "Operation Choke Point," portraying the investigation as unjustly cutting off banking services to lawful, compliant businesses. This effort energized support from grassroots audiences.
- **Paid Advertising Campaign.** Narrative also led a targeted campaign that intensified public and congressional opposition to the head of the regulatory agency.
- **Grassroots Activation.** Additionally, the team mobilized grassroots teams to publish aligned op-eds in key outlets and attend consequential committee hearings, amplifying concerns about regulatory overreach.
- **Strategic Media Relations.** Narrative leveraged its deep connections with financial, political, and conservative media to generate multiple news cycles that incorporated the bank's messaging and aligned perspectives. To strengthen the bank's public image, our team helped craft a positive narrative highlighting the bank's philanthropic contributions and the value it provides to consumers, small businesses, and the broader financial industry.

IMPACT

As a result of Narrative's strategic efforts, the regulatory agency abandoned its investigation and chose not to pursue any enforcement action against the bank, securing its future and preserving its reputation.