



**Statement for the Record  
House Committee on Financial Services Markup  
May 21, 2025**

**Re: H.R. 2702 – Financial Integrity and Regulation Management (FIRM) Act**

Chairman Hill, Ranking Member Waters, and Members of the Committee:

The Free Speech Coalition (FSC) respectfully submits this Statement for the Record to express our appreciation for the Committee’s continued attention to the issue of debanking and to offer our support for H.R. 2702, the Financial Integrity and Regulation Management (FIRM) Act.

As the national trade association for the adult entertainment industry, FSC applauds the Committee’s bipartisan efforts to address the widespread and discriminatory practice of “debanking,” and we commend you for advancing legislation that aims to protect lawful individuals and small businesses from arbitrary denial of financial services based solely on vague notions of reputational risk.

For years, individuals and small businesses operating in the adult content industry—including sex workers, independent creators, legal adult production companies and their employees and the trade association itself—have struggled to maintain access to basic financial services. Despite operating lawfully, many are de-risked by banks and payment processors due to reputational concerns, opaque compliance practices, or perceived regulatory scrutiny. This persistent exclusion from the financial system has made it harder for members of our community to pay rent, secure loans, or simply open a personal or business checking account.

The FIRM Act represents a meaningful step toward addressing these challenges. By prohibiting federal banking regulators from formally or informally pressuring financial institutions to terminate accounts based solely on “reputational risk,” the bill would help ensure that lawful businesses and individuals are not denied services without cause or due process. This protection is especially important for those in marginalized industries that have historically borne the brunt of such practices.

While we are especially encouraged by the bill’s commitment to transparency and regulatory accountability, we believe the FIRM Act presents a strong opportunity for broader reforms aimed at promoting a more safe, inclusive banking system. Unfortunately, the bill addresses only one piece of the puzzle, but additional work is needed to fully modernize the regulatory landscape governing bank relationships with adult content creators. In particular, we urge the Committee to examine and update existing guidance issued under the Bank Secrecy Act (BSA) and anti-money laundering (AML) frameworks—especially those related to human trafficking. Though combating trafficking is a vital and shared goal, current guidance too often conflates

legal, consensual adult work with exploitation and criminal activity, leading to the blanket exclusion of sex workers and creators from the financial system.

We encourage the Committee to work with financial regulators, industry stakeholders, and affected communities to clarify risk-based compliance expectations and to ensure that enforcement practices are evidence-based, narrowly tailored, and aligned with civil liberties. Providing financial institutions with clearer, modernized guidelines will enable them to serve a broader range of legal businesses without fear of regulatory reprisal.

On behalf of the Free Speech Coalition and our members, we thank you for your leadership on this important issue. We stand ready to work with the Committee to ensure a fair, inclusive, and accountable financial system for all.

Sincerely,

Alison Boden

A handwritten signature in black ink, appearing to read "Alison Boden". The signature is fluid and cursive, with the first name "Alison" written in a larger, more prominent script than the last name "Boden".

Executive Director  
Free Speech Coalition