CBA Community Bankers Association of Kansas

Capitol Comments

March 2010 - INTERSTATE CAPITOL COMMENTS

Community Bankers Association of Kansas
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CBA Community Bankers Association of Kansas

CBA Chairman's Annual Golf Classic

May 24th, 2010

WHERE

Buffalo Dunes Golf Course
5685 S. Hwy 83
Garden City, Kansas 67846
620-276-1210

WHEN

Monday, May 24, 2010

8:00 a.m. – Shotgun Start
(4 man scramble format)

12:30 p.m. – Reception/Lunch
(reception/lunch will be at the golf course)

(To access a blue underlined hyperlink, place your cursor on the link, use Ctrl + Click and the page will open.)

Final Rule: Fed rule restricting fees and expiration dates on gift cards

The Fed announced final rules to restrict the fees and expiration dates that may apply to gift cards. The final rules prohibit dormancy, inactivity, and service fees on gift cards unless: (1) the consumer has not used the certificate or card for at least one year; (2) no more than one such fee is charged per month; and (3) the consumer is given clear and conspicuous disclosures about the fees. Expiration dates for funds underlying gift cards must be at least five years after the date of issuance, or five years after the date when funds were last loaded. The Board's rules generally cover retail gift cards, which can be used to buy goods or services at a single merchant or affiliated group of merchants, and network-branded gift cards, which are redeemable at any merchant that accepts the card brand.

The final rules are issued under Regulation E to implement the gift card provisions in the Credit Card Accountability Responsibility and Disclosure Act of 2009. The notice[i] will be published in the Federal Register. The final rules are effective August 22, 2010.

Comment: There are two types of gift cards, closed loop-cards and open-loop cards. Closed loop are generally accepted at a single merchant or group of affiliated merchants. These are not issued by financial institutions. Open-loop cards usually carry a network brand (Visa, Mastercard, etc.), can be used at a variety of retailers, are typically issued by financial institutions, and are more likely to carry fees and the capability of being reloaded. (Open-loop cards are generally considered "general-use prepaid cards" under the rule.) The final rule applies to both close-loop and open-loop cards issued to consumers primarily for personal family, or household purposes.

Fed publishes online consumer publication on ATM and debit card transaction overdrafts

The Federal Reserve posted a new online publication to help consumers better understand rules when a debit card or ATM transaction causes an account to be overdrawn. What You Need to Know: New Overdraft Rules for Debit and ATM Cards[ii] provides an explanation of how the rules will affect existing and new account holders. It contains basic information about types and typical costs of overdraft services and defines common terms consumers may encounter in communications from their bank about overdrafts. Financial institutions will soon begin providing notices explaining their overdraft services, and this publication will help consumers understand how to use the information to make the best choices regarding those services.

Comment: Like most notices that are sent to customers, this one will likely be ignored by most customers. Bankers need to write letters to their local papers informing readers to watch the mail for the overdraft notices, and to respond to them. Many banks are choosing to make follow-up calls to customers a few days after mailing the notices.

The 2010 Senior Bank Executives & Board Chairs Forum

You are cordially invited to join your fellow Banking Executives & Board Chairs for the 2010 Senior Bank Executives & Board Chairs Forum hosted by the Independent Community Bankers Association of New Mexico and co-hosted by the Community Bankers Association of Kansas, Community Bankers Association of Oklahoma, and the Independent Bankers Association of Texas beginning the evening of May 18, 2010 and concluding on May 19, 2010 at the La Posada de Santa Fe Resort and Spa, 330 E. Palace Ave. in Santa Fe, New Mexico.

Victory in Subchapter S Bank Association funded appeal

The appeal from the Tax Court case of *Vainisi v. Commissioner of Internal Revenue* presented an important question concerning the taxation of banks that either (1) are subchapter S corporations or (2) are wholly owned by such corporations and are classified as "qualified subchapter S subsidiaries" ("QSubs"). Thirty-one percent of all federally insured banks are either subchapter S corporations or QSubs (by number, not deposits—these banks are mainly small community banks). The question was whether they can deduct all or merely part of the interest expense that they incur to purchase certain tax-exempt bonds. The court held that they can deduct it all. Vainisi v Commissioner of Internal Revenue.[iii]

Comment: The appeal of this case was funded by donations from members of the Subchapter S Bank Association and by donations from several other community bank associations. This 7th Circuit decision is technically only binding on federal courts in the 7th Circuit. However, because of the lack of reason in the lower court ruling, the unanimous reversal of that ruling, and the stature of the judge who wrote the decision, it seems reasonable for a CPA to recommend taking the 100% deduction. If you do so, you might attach a disclosure statement to the tax return based on your CPA's assessment of the law. It would certainly be an inconvenience to amend every shareholder's tax return. If you are a Sub-S bank, you should call your CPA to determine if you can take advantage of this decision. If you have a question about the decision, call the Subchapter S Association at 512.474.6982.

Wachovia enters into deferred prosecution agreement

The U.S. Attorney's Office charged Wachovia with willfully failing to maintain an anti-money laundering program from May 2003 through June 2008, in violation of the BSA. Wachovia failed to effectively monitor for potential money laundering activity more than $420 billion in financial transactions with Mexican currency exchange houses, commonly known as "casas de cambio" (CDCs).

As part of a deferred prosecution agreement Wachovia has agreed to forfeit $110 million, which represents proceeds of illegal narcotics sales that were laundered through Wachovia. FinCEN also assessed a $110 million Civil Money Penalty that is deemed satisfied by the forfeiture, for serious and systemic BSA violations. Wachovia has agreed to pay an additional $50 million fine to the U.S. Treasury. The total sum of $160 million is due within five days from the date of the agreement.

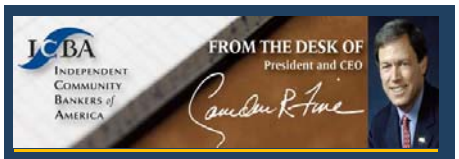
According to the documents filed with the court, Wachovia was aware, as early as 1996 and through 2004, of the high risk that drug money was being of laundered through the CDCs. Wachovia was also aware that other U.S. banks had stopped doing business with the CDCs because of these concerns. Wachovia, however, continued to expand its business with the CDCs. Indeed, from at least May 2004 through December 2007, Wachovia provided correspondent banking services to various Mexican CDCs, including wire transfer, bulk cash, and pouch and remote deposit capture services, among others. Consent Order for a Civil Money Penalty.[iv] Consent Order.[v]

Comment: If you think that FinCEN isn't serious about compliance with BSA, just count the number of zeroes on the total fine and penalty Wachovia agreed to pay.

Interagency policy statement on funding and liquidity

The OCC, FRB, FDIC, and OTS, in conjunction with the Conference of State Bank Supervisors, adopted an "Interagency Policy Statement on Funding and Liquidity Management."[vi] The policy statement summarizes the principles of sound liquidity risk management that the agencies issued in the past and, when appropriate, supplements them with the "Principles for Sound Liquidity Risk Management and Supervision" issued by the Basel Committee on Banking Supervision in September 2008. This policy statement emphasizes supervisory expectations for all depository institutions.

Comment: Given the recent market turmoil, the agencies are reiterating the importance of effective liquidity risk management for the safety and soundness of financial institutions. This policy statement emphasizes the importance of cash flow projections, diversified funding sources, stress testing, a cushion of liquid assets, and a formal, well-developed contingency funding plan as primary tools for measuring and



FINE POINTS

A MESSAGE FOR ALL TIMES

Every year since I became ICBA's president and CEO, I have given a speech on the state of our association during the ICBA National Convention. In my first such address, I vowed that ICBA would become militantly active for community bank interests in Washington. I promised then that our association would take the offense.

Today the evidence is everywhere and overwhelming that we have done just that. On every major financial issue, ICBA and community bankers are at the policy tables in Washington. Community banking leaders have met with President Obama in the White House on three high-profile occasions during the past year. Your ICBA staff now regularly joins the policy-table discussions in the White House, the Treasury, the regulatory agencies and the offices of House and Senate leaders.

managing liquidity risk. The agencies expect each financial institution to manage funding and liquidity risk using processes and systems that are commensurate with the institution's complexity, risk profile, and scope of operations.

OCC: Community bank directors workshops

The OCC will host workshops for directors of nationally chartered community banks in:

- Shreveport, Louisiana, at the Hilton Shreveport, April 20-21, 2010
- Philadelphia, Pennsylvania, at the Park Hilton Philadelphia, April 12-14, 2010

The workshops provide practical information that expands bank directors' skills and understanding of issues facing their banks. The workshops cover credit risk and costs $65. Each workshop is limited to the first 35 registrants and is geared primarily to outside directors of national community banks with assets of less than $1 billion. Management directors may also find the workshop beneficial. For information or to register online, visit or call 336.451.0557.

Comment: Training is a necessity for bank directors, and this training is available at a very reasonable price.

FFIEC: S.A.F.E. Act FAQs

If you have questions about the S.A.F.E. Act requirements, the FFIEC's S.A.F.E. Act FAQs[vii] is a good place to start.

Comment: Probably the most asked question by mortgage loan originators at institutions regulated by federal financial institution regulatory agencies is: "When do I have to complete my Federal registration?" And the abbreviated answer is: No action is required now. The Agencies will notify their regulated institutions when the Registry becomes operational.

Proposed Rule: Fed proposes amendments to clarify overdraft rules

On November 17, 2009, the Board published final rules amending Regulation E, which implements the Electronic Fund Transfer Act, and the official staff commentary to the regulation. The final rule limited the ability of financial institutions to assess overdraft fees for paying automated teller machine (ATM) and one-time debit card transactions that overdraw a consumer's account, unless the consumer affirmatively consents, or opts in, to the institution's payment of overdrafts for those transactions. The Board proposes to amend Regulation E and the official staff commentary to clarify certain aspects of the final rule. Comments must be received on or before

Comment: Most importantly, the proposals clarify that all financial institutions are prohibited from charging overdraft fees without a consumer's affirmative consent, including institutions with a policy and practice of declining ATM and one-time debit card transactions when the account has insufficient funds.

OCC: HMDA - Revised booklet

Changes in the HMDA booklet[viii] of the Comptroller's Handbook include a revised definition of a rate-spread loan and associated changes to examination procedures. Also, banks must now download disclosure statements from the FFIEC Web site.

Federal Reserve Banks complete check processing infrastructure changes

The Fed has completed the reduction in paper check processing infrastructure that was begun in late 2003. With the discontinuation of paper check processing at the Atlanta office on Friday, Feb. 26, 2010, all paper check processing is now handled at the Cleveland office. The Atlanta office serves as the Reserve Banks' processing location for electronic check processing. Since late 2003, the Reserve Banks have reduced the number of locations where paper checks are processed from 45 offices to a single site in Cleveland.

Comment: The implementation of the Check Clearing for the 21st Century Act in October, 2004, significantly reduced the number of check items collected in paper form throughout the industry. At the time Check 21 went into effect, 100 percent of the items processed by the Reserve Banks were in paper form. Today, almost 99 percent are processed as images. For banking, this is an historic event, but it came and went

ICBA's messages, your messages, echo in the president's speeches, including his State of the Union address.

Over the past few months and years, ICBA has demonstrated that the community banking industry is a force to be reckoned with. We have seized the high ground in the financial-reform debate. And what has our unprecedented access in Washington accomplished?

ICBA has …

- increased the deposit-insurance-coverage cap to $250,000,
- obtained 100-percent deposit-insurance coverage for transaction accounts,
- deflected much of the 20-cent special assessment to the largest banks,
- secured tax breaks for GSE preferred stock,
- stopped mortgage-cramdown legislation,
- stopped expanded credit-union lending powers,
- halted the Farm Credit System's Horizon Project,
- ensured community banks access to several government financial-industry assistance program,

without fanfare. To go from 45 locations processing checks to one in seven years is simply amazing.

FDIC: Quick online tips for consumers

FDIC has begun regularly delivering timely tips on money management on the agency's Web site and through an e-mail subscription service. The first tip was posted on Monday, March 8, and will continue on a weekly basis as the FDIC "Consumer Tip of the Week."

Comment: This looks like a quick, easy, and free way to provide weekly consumer tips to your customers.

FDIC offers 10 tips for safe online banking, bill paying and shopping

The Winter 2009/2010 issue of FDIC Consumer News[ix], published by the Federal Deposit Insurance Corporation, offers 10 ways to protect against theft and errors online. Other articles discuss overdraft costs, medical debts and small business financing.
To order up to two free paper copies, use the online form on that same Web page or call the Federal Citizen Information Center toll-free at 1-888-8-PUEBLO (1-888-878-3256). The publication may be reprinted in whole or in part without advance permission. Organizations also may link to or mention the FDIC Web site.

Comment: The FDIC encourages financial institutions to reprint their Consumer News[x] without permission. You may add your bank's logo or a message from your bank on the reprint.

Revised interagency questions and answers on CRA

The Federal Reserve, along with the FDIC, the OCC, and the OTS (Agencies) recently approved the publication of new and revised Interagency Questions and Answers Regarding Community Reinvestment.[xi] This version of the Questions and Answers consolidates and supersedes all previously published versions. The Agencies adopted one new and two revised questions and answers. In addition, the Agencies also made a conforming revision to one other question and answer.

Comment: The new questions and answers provide examples of ways an institution could determine that its community services are targeted to low- and moderate-income individuals. The revision to the question and answer that discusses "primary purpose" now allows pro-rata consideration for providing affordable housing for low- and moderate-income individuals through mixed-income housing. The Agencies also revised the question and answer on reporting requirements for community development loans and made a conforming change to the question and answer that provides examples of "other loan data."

PUBLICATIONS, REPORTS, STUDIES, TESTIMONY & SPEECHES

- **FTC issues report of 2009 consumer complaints; Video details how to file Complaint**

The FTC released a report listing top complaints consumers filed with the agency in 2009. It shows that while identity theft remains the top complaint category, identity theft complaints declined 5 percentage points from 2008. The FTC released an animated video[xii] showing how people can file a complaint, and offering examples of what complaints the FTC handles. The video is also available in Spanish[xiii]. The report breaks out complaint data on a state-by-state basis and also contains data about the 50 metropolitan areas reporting the highest per capita incidence of fraud and other complaints. In addition, the 50 metropolitan areas reporting the highest incidence of identity theft are noted.

The top five complaints were:

1. Identity Theft
2. Third Party and Creditor Debt Collection
3. Internet Services
4. Shop-at-Home and Catalog Sales
5. Foreign Money Offers & Counterfeit Checks

- expanded SBA lending programs,
- won community banks exemptions from a range of new and crippling assessments and fees,
- shielded our members entirely from new examination forces,
- expanded Subchapter S corporation terms and benefits and
- advocated vigorously for more even-handed examinations for community banks.

I could go on. But one other accomplishment must never be underestimated: ICBA and our members have together drawn a bright line understanding in the public's mind between a Main Street community bank and a Wall Street megabank. Now policy-makers and the public know that community banks are the heart and lifeblood of this nation. They recognize that community bankers kept our financial sector going when Wall Street slid into the heart of financial darkness—that your bank's lending *increased* when Wall Street's fell. And while Wall Street investors and executives rewarded themselves with your tax dollars, policymakers understand that you have had to overcome harsh and counterproductive

- **Financial regulators release updated retail payment systems booklet**

The FFIEC issued updated guidance for examiners, financial institutions, and technology service providers on the risks associated with retail payment systems. This Retail Payment Systems Booklet[xiv], which is part of the FFIEC Information Technology Examination Handbook series, is an update to the 2004 version that provided guidance on the risks and risk-management practices applicable to financial institutions' retail payment systems activities, including checks, electronic payments related to credit cards and debit cards, and the automated clearing house (ACH). Appendices to this booklet include examination procedures and references to applicable laws, regulations, and guidance.

The revised booklet addresses changes in technology and provides guidance on Check 21. This booklet also provides expanded guidance on merchant card processing and ACH activities. It provides a discussion of the increased risks posed by these activities and some of the risk management and mitigation tools. There is also a brief discussion on emerging technologies in retail payment systems. The booklet includes information on remotely created checks and electronically created payment orders. Lastly, the booklet addresses remote deposit capture and provides examination procedures for use in conjunction with the FFIEC guidance, Risk Management of Remote Deposit Capture (January 14, 2009).[xv]

- **FedFocus℠**

March FedFocus[xvi] articles: Abacus views earlier returns, delivered electronically, as win-win; FedACH® Services: Grab your ticket to new cross-border destinations; Fed ACH® Services: We're adding more plusses to the FedEDI® Plus Service; Fedline® Access Solutions: Want to leverage the value of our FedLine access solutions; Treasury Services: What's the buzz about savings bond training.

- **FedFlash®**

Find March 2010 FedFlash®[xvii] national operational news regarding Check/Check 21 Services, FedACH® Services, FedCash® Services, and Treasury Services. The only district news this month is for the First District.

- **OCC: HMDA - revised booklet**

Changes in the HMDA booklet[xviii] of the Comptroller's Handbook include a revised definition of a rate-spread loan and associated changes to examination procedures. Also, banks must now download disclosure statements from the FFIEC Web site.

- **Fed: BHC supervisory manual updated**

Bank Holding Company Supervision Manual[xix] - January 2010 update. You can also access the manual by sections.[xx]

Important upcoming compliance dates:

03.31.2010 TALF program expires.[xxi]

04.01.2010 Reg. Z[xxii] – Escrow on higher priced loans (Specifically, 12 CFR 226.35(b)(3)[xxiii] is effective April 1, 2010.)

06.01.2010 Reg GG (Prohibition on Funding of Unlawful Internet Gambling)[xxiv].–. Requires non-exempt participants in designated payment systems to establish and implement written policies and procedures that are reasonably designed to identify and block or otherwise prevent or prohibit unlawful Internet gambling transactions. Reg GG (Extension of compliance date)[xxv]

06.30.2010 TAG program expires.

07.01.2010 Implementing FACT Act Accuracy & Integrity Rules: Deadline July 1, 2010

07.01.2010 Reg. Z[xxvi] – This is the mandatory compliance date for all provisions of the final rule on open end credit that were not mandatory on February 22, 2010. Generally, the Fed retained a July 1, 2010 mandatory compliance date for those provisions originally adopted in the January 2009 Regulation Z Rule that are not requirements of the Credit Card Act.

examinations simply to continue sustaining your communities through a historic calamity not of your making.

For decades the Wall Street megafirms set the financial-services agenda in Washington. But beginning in 2008, ICBA and community bankers have let all of America know that times have changed. Now, with a possible endgame nearing for congressional negotiations over financial-reform legislation, all community bankers must continue to show that this is our financial system too. We must not back away from fighting together to preserve our franchises, our communities and the great diversity and strength of this nation's community banking system.

The decades of subservience to Wall Street are over. That's an industry message that together you and I will deliver to Washington policymakers now and forever.

By Camden R. Fine
President and CEO of ICBA

Reach Camden R. Fine at cam.fine@icba.org.

07.01.2010 Reg Z and Reg. AA (Unfair or Deceptive Practices)[xxvii] – A lender may not consider a credit card payment late unless statement is provided 21 days prior to due date. Requirements on how credit cards payments above minimum are allocated. Restriction on when credit card rates may change. Finance charges on previous billing cycles limited. Security deposits and fees limited.

07.01.2010 Reg E – The final rule limits the ability of a financial institution to assess an overdraft fee for paying ATM and one-time debit card transactions that overdraw a consumer's account, unless the consumer affirmatively consents, or opts in, to the institution's payment of overdrafts for these transactions.

07.01.2010 FACT Act (Fair and Accurate Credit Transactions Act[xxviii] –Those furnishing consumer information to a consumer reporting agency must establish reasonable policies and procedures for implementing the guidelines in Appendix E.

08.22.2010 Reg E[xxix] - The final rules prohibit dormancy, inactivity, and service fees on gift cards unless: (1) the consumer has not used the certificate or card for at least one year; (2) no more than one such fee is charged per month; and (3) the consumer is given clear and conspicuous disclosures about the fees. Expiration dates for funds underlying gift cards must be at least five years after the date of issuance, or five years after the date when funds were last loaded.

10.01.2010 Reg Z – Higher priced mortgage loan escrow for manufactured homes (See Reg Z changes for 04.01.2010)

01.01.2011 FACT Act[xxx] – Generally require a creditor to provide a consumer with a notice when, based on the consumer's credit report, the creditor provides credit to the consumer on less favorable terms than it provides to other consumers. Alternatively, a creditor may provide such a consumer with a free credit score and information about their score.

12.31.2013 FDIC deposit insurance[xxxi] temporary limit increase to $250,000 expires.

Compliance dates from the not-so-distant past:

02.27.2010 Reg. CC[xxxii] -- These amendments reflect the restructuring of check-processing operations within the Federal Reserve System. Subsequent to these amendments, there will only be a single check-processing region for purposes of Regulation CC and there will no longer be any checks that are nonlocal.

02.22.2010 Reg Z[xxxiii]. – Amendments establish a number of new substantive and disclosure requirements pertaining to open-end consumer credit plans, including credit card accounts. This is the mandatory compliance date for the portion of § 226.5(a)(2)(iii) regarding use of the term "fixed" and for §§ 226.5(b)(2), 226.7(b)(11), 226.7(b)(12), 226.7(b)(13), 226.9(c)(2)(except for 226.9(c)(2)(iv)(D)), 226.9(e), 226.9(g) (except for 226.9(g)(3)(ii)), 226.9(h),226.10, 226.11(c), 226.16(f), and §§ 226.51-226.58. The compliance date for all other provision of this final rule is 07.01.2010.

02.14.2010 Reg. Z[xxxiv] – Amendments revising the disclosure requirements for private education loan become mandatory.

01.19.2010 Reg Z[xxxv] – The purchaser or assignee that acquires a mortgage loan must provide the required disclosures in writing no later than 30 days after the date on which the loan is sold or otherwise transferred or assigned. (This rule was effective on 11.20.2009, but compliance was optional until 01.19.2010.)

01.01.2010 Reg. X (RESPA)[xxxvi] – GFE and HUD-1 both change. Fee variance between GFE and HUD-1 limited based on fee type. Except with

change of circumstances and new disclosures (within 3 business days of change), lender is locked into the fees originally disclosed for 10 business days after such disclosure.

01.01.2010	Reg. DD (Truth-in-Savings)[xxxvii] – Disclose overdraft fees for statement period and YTD on periodic statements. Balances on automated systems (e.g. ATMs) must not include overdraft protection amount.
01.01.2010	Reg. S[xxxviii] – Update the fees to be charged for producing records and takes account of recent advances in electronic document productions.
01.01.2010	Effective date of TAG participant opt-out.
12.31.2010	GLBA (Model Privacy Form)[xxxix] – The agencies adopted a model privacy form that financial institutions may rely on after 12.31.2010 as a safe harbor to provide disclosures under the privacy rules.
12.30.2009	Prepay quarterly risk-based FDIC assessments for the fourth quarter of 2009, and for all of 2010, 2011, and 2012, on December 30, 2009, along with risk-based assessment for the third quarter of 2009.
12.01.2009	**COMPLIANCE DATE EXTENDED TO 06.01.2010.** Reg. GG (Unlawful Internet Gambling Act)[xl] – Must send required notice to existing customers. Must perform due diligence at account opening and have procedures for dealing with violations.
10.01.2009	Reg. C (HMDA)[xli] – Loans requiring a rate spread must use Reg. Z's new higher priced loan definition.
10.01.2009	Reg. Z (TIL)[xlii] – Higher priced mortgage loan consumer protections; prohibits appraiser influence; prohibits unfair/deceptive servicing standards on dwelling secured closed end loans; advertising rules open & closed end loans; changes on HOEPA loan criteria.
09.18.2009	New International ACH Transaction (IAT) rule[xliii] requiring all international ACH payments to be uniquely identified.

Comment: Distribute this calendar to your CEO, CFO, Compliance Officer, and Operations Officer.

This publication is designed to provide accurate and authoritative information in regard to the subject matter covered. It is provided with the understanding that the publisher is not engaged in the rendering of legal, accounting or other professional advice - from a Declaration of Principles adopted by the American Bar Association and a Committee of Publishers and Associations.

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[i] http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20100323a1.pdf

[ii] http://www.federalreserve.gov/consumerinfo/wyntk_overdraft.htm

[iii] http://www.ca7.uscourts.gov/tmp/W30Q6J0L.pdf

[iv] http://www.occ.treas.gov/ftp/release/2010-30c.pdf

[v] http://www.occ.treas.gov/ftp/release/2010-30b.pdf

[vi] http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20100317.pdf

[vii] http://www.ffiec.gov/safeact.htm

[viii] http://www.occ.treas.gov/handbook/hmda.pdf

[ix] http://www.fdic.gov/CONSUMERS/CONSUMER/news/cnwin0910/index.html

[x] http://www.fdic.gov/consumers/consumer/news/cnwin0910/index.html

[xi] http://www.ffiec.gov/cra

[xii] http://ftc.gov/multimedia/video/scam-watch/file-a-complaint.shtm

[xiii] http://ftc.gov/multimedia/video/scam-watch/file-a-complaint_es.shtm

[xiv]http://www.ffiec.gov/ffiecinfobase/html_pages/retail_book_frame.htm

[xv]http://www.ffiec.gov/pdf/pr011409_rdc_guidance.pdf

[xvi] http://www.frbservices.org/fedfocus/index.html

[xvii] http://www.frbservices.org/fedflash/index.html

[xviii] http://www.occ.treas.gov/handbook/hmda.pdf

[xix]http://www.federalreserve.gov/boarddocs/supmanual/bhc/bhc.pdf

[xx]http://www.federalreserve.gov/boarddocs/supmanual/supervision_bhc.htm

[xxi]http://www.federalreserve.gov/monetarypolicy/20090817a.htm

[xxii] http://edocket.access.gpo.gov/2008/pdf/E8-16500.pdf

[xxiii] http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=54084c95801c7a737f1e9482f547274f;rgn=div2;view=text;node=20080730%3A1.19;idno=12;cc=ecfr;start=1;size=25

[xxiv]http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20081112a1.pdf

[xxv] http://edocket.access.gpo.gov/2009/E9-28746.htm

[xxvi] http://edocket.access.gpo.gov/2009/pdf/E8-31185.pdf

[xxvii] http://edocket.access.gpo.gov/2009/pdf/E8-31186.pdf

[xxviii]http://www.ftc.gov/os/2009/07/R611017factafrn.pdf

[xxix]http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20100323a1.pdf

[xxx] http://edocket.access.gpo.gov/2010/pdf/E9-30678.pdf

[xxxi]http://www.fdic.gov/deposit/deposits/difactsheet.html

[xxxii] http://edocket.access.gpo.gov/2010/E9-31254.htm

[xxxiii]http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20100112a1.pdf

[xxxiv]http://www.federalreserve.gov/newsevents/press/bcre http://www.federalreserve.gov/consumerinfo/wyntk_overdraft.htm g/20090730a.htm

[xxxv] http://edocket.access.gpo.gov/2009/E9-27742.htm

[xxxvi]http://www.hud.gov/offices/hsg/ramh/res/finalrule.pdf

[xxxvii] http://edocket.access.gpo.gov/2009/pdf/E8-31183.pdf

[xxxviii] http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=635f26c4af3e2fe4327fd25ef4cb5638&tpl=/ecfrbrowse/Title12/12cfr219_main_02.tpl

[xxxix] http://edocket.access.gpo.gov/2009/E9-27882.htm

[xl]http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20081112a1.pdf

[xli] http://edocket.access.gpo.gov/2008/pdf/E8-25320.pdf

[xlii]http://www.federalreserve.gov/boarddocs/meetings/2008/20080714/draftfedreg.pdf

[xliii] http://www.nacha.org/IAT_Industry_information/