



May 2009 - INTERSTATE CAPITOL COMMENTS

Community Bankers Association of Kansas

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CBA Seminar Information

CBA will be offering the following seminars for Kansas community bankers. If you have any questions regarding the seminars please feel free to give Shawna a call at 800-258-4589 or email her at shawna@cbak.com. We look forward to seeing you at the seminars.

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

Final rules on Truth in Lending mortgage disclosures

On July 30, 2008, Congress enacted the Housing and Economic Recovery Act of 2008, which included amendments to TILA, known as the Mortgage Disclosure Improvement Act of 2008 (MDIA). On October 3, 2008, Congress amended the MDIA in connection with its enactment of the Emergency Economic Stabilization Act of 2008. The Federal Reserve Board (FRB) revised Regulation Z to implement the provisions of the MDIA, as amended. The MDIA broadens and adds to the requirements of the FRB's July 2008 final rule. Consistent with the MDIA, the [final rule](#)ⁱ amending Regulation Z requires creditors to make good faith estimates of the required mortgage disclosures, and deliver or place them in the mail, no later than three business days after receiving a consumer's application for a dwelling-secured closed-end loan. Consummation may occur on or after the seventh business day after the delivery or mailing of these disclosures. These requirements will become effective on July 30, 2009. [74 FedReg 23289](#).ⁱⁱ

Comment: Highlights include: The amendment allows an expedited closing where there is a personal financial emergency. To shorten or waive a waiting period, the consumer must give the creditor a dated written statement that describes the emergency, specifically modifies or waives the waiting period, and bears the signature of all the consumers who will be primarily liable on the legal obligation. Creditors may not use pre-printed forms for this purpose. Early disclosures are also required for dwellings other than the borrower's principal residence. If the mortgage loan is subject to RESPA, the early disclosures must be given. Disclosure requirements for HELOCs are not changed (but they are being reviewed). The final rule also applies the definition of "business day" (all calendar days except Sundays and specified legal public holidays) to the seven-business-day and the three-business-day waiting period. To facilitate compliance for creditors that use the same form for the initial disclosures and final disclosures, new comment 17(a)(1)–5(xvi) clarifies that creditors may also include the notice described in § 226.19(a)(4) on the disclosures provided at consummation and may group the notice together with the disclosures required by § 226.18.

Fair Credit Reporting Affiliate Marketing Regulations; Identity Theft Red Flags and Address Discrepancies under the Fair and Accurate Credit Transactions Act of 2003

The OCC, FRB, FDIC, OTS and NCUA published in the Federal Register final rules to implement the affiliate marketing provisions of the Fair and Accurate Credit Transactions Act of 2003 (FACT Act) on November 7, 2007. The OCC, FRB, FDIC, OTS, NCUA and the FTC published in the Federal Register final rules and guidelines

Robbery of Financial Institutions & Armed Robbery Prevention



*Presented by
Scott Teeselink*

Scott Teeselink has thirty-eight years of law enforcement experience. This includes working as a patrolman in the Wichita Police Department, a Detective at the Shawnee County Sheriff's office, and thirty years with the Kansas Bureau of Investigation where he held responsibilities as an undercover narcotics agent, development for the KBI Anti-Crime Unit, KBI Training Coordinator, KBI Narcotics Agent, and the KBI Crime Prevention Program for robbery of financial institutions. Scott works as a crime prevention specialist and security consultant. Currently, Scott now works with the Kansas Highway Patrol / Capitol Police.

LOCATIONS

June 8th - Winfield
June 9th - Concordia



to implement the identity theft red flags and address discrepancy provisions of the FACT Act on November 9, 2007. On May 14, 2009, these agencies published in Federal register technical corrections. [74 FedReg 22639](#).ⁱⁱⁱ

Comment: The technical corrections included in this Federal Register document revise one of the affiliate marketing model forms and the instructions to the model forms to correct inadvertent omissions and conform the model forms and the instructions to the affiliate marketing rules, and correct minor errors in the identity theft red flags and address discrepancy rules and guidelines. The substantive requirements of the affiliate marketing and the identity theft red flags and address discrepancy rules are unchanged. Some of these final rules were effective May 14, 2009, and others will be on January 1, 2010.

FRB video reveals how bank accounts assist recovery of disaster victims

The Federal Reserve's (FRB) "[Lessons from a Storm](#)" - [Banking for Safety Video](#)^{iv} is available for [ordering](#)^v (DVD) or viewing online. After Hurricane Katrina in New Orleans, having a bank account was a big advantage to individuals and families trying to get back on their feet and re-establish a firm financial footing. The 17.5 minute video profiles actual and dramatized families who learn about the importance and benefits of having a bank account, including a place to receive both regular and storm-related payments; safe, convenient, and quick access to their money; automatic bill-paying; on-line banking; and encouragement to save. [Press Release](#).^{vi}

Comment: If you live in an area where natural disasters have struck or are likely to strike, this video would make a great addition to your community financial education efforts. You might also link to it on your Web page so that those providing financial education will go to your Web site when showing this.

FRB provides consumer calculator to estimate time to pay off credit card bills

The Federal Reserve Board's online Credit Card Repayment Calculator will allow consumers to estimate how long it will take to pay their credit card bills under different payment scenarios. Consumers can use the calculator to estimate how long it will take to pay off their credit card bills if they only make minimum payments. They can also estimate the monthly payments needed to pay off a balance in a specific number of years or the amount of time it will take to pay off their balance if they pay a specific amount each month. Both [English](#)^{vii} and [Spanish](#)^{viii} versions are provided.

Comment: This calculator give consumers an estimate of how long it will take to pay off their credit cards, but they will need to contact their credit card company for an accurate payoff date.

FDIC: Guidance on classification treatment for high LTV residential refinance loans

Loans to refinance performing real estate mortgages to a lower interest rate, despite a higher LTV, generally should not be adversely classified provided the credit complies with sound underwriting guidelines. The FDIC is affirming that the standards in the [Uniform Retail Credit Classification and Account Management Policy](#)^{ix} should be followed relative to the classification treatment for high LTV residential refinance loans. The guidance establishes that retail loan classifications should be based on the borrower's payment performance, not the value of the collateral, which can rise and fall as market conditions change. [FIL-19-2009](#)

Comment: If you don't think that your examiners are following this guidance, contact your examiner in charge or the regulator's ombudsman. Also, please let us know.

FRB: Error in Reg DD amendment corrected

On January 29, 2009, the FRB published final rules amending Regulation DD, which implements the Truth in Savings Act, and the official staff commentary to the regulation. The final rule, among other things, requires all depository institutions to disclose aggregate overdraft fees on periodic statements, and not solely institutions that promote the payment of overdrafts. However, the document published in the Federal Register on January 29, 2009 ([74 FedReg 17768](#))^x contains a technical error in the

RESPA

Presented by
Anne Lolley

Anne has been making compliance issues easier for bankers for over two decades. Her expertise at simplifying the complex and creating workable reference manuals from complicated banking laws has made her a popular instructor. Anne obtained her law degree from the University of Kansas. She has been deciphering compliance issues for bankers in Kansas since 1981. She created and presented the well-known Legal Update Seminars to a statewide audience annually.

Telephone Workshop

June 10th
10:00 am – 11:00 am

formatting of the sample form illustrating how institutions may comply with this requirement. To correct this error, the FRB republished the appropriate sample form. Here is the appropriate form:

	Total For This Period	Total Year-to-Date
Total Overdraft Fees	\$60.00	\$150.00
Total Returned Item Fees	\$0.00	\$30.00

Comment: Some bankers have asked about the Reg DD requirements for overdraft on the periodic statement. The best advice is that, if your bank is amending the periodic statements with respect to overdrafts, it might as well get a head start and comply with the amended Reg. DD provisions that are effective January 1, 2010. And remember, the changes affect all financial institutions, not merely those that promote overdraft payment.

FDIC warns that shell and shelf companies may be used as vehicles for financial fraud

The FDIC was recently alerted by the Better Business Bureaus of possible fraudulent or improper activity involving businesses advertising that they can assist borrowers, who may not otherwise be able to qualify for a loan, obtain an unsecured business line of credit. These businesses do this by selling a "shell" or "shelf company" to the potential borrower. The potential borrower is then able to substitute the creditworthiness and business history of the shell or shelf company for their own in an attempt to obtain credit. While financial institutions may use different underwriting based on their risk tolerance, in one example, potential borrowers were advised to request a line of credit below \$150,000, suggesting that bank underwriting standards at this level are less stringent. These businesses promise that the borrower will not have to provide business or personal financial statements, income tax returns and personal guarantees, and that the lending financial institution will not pull a personal credit report. Borrowers are promised positive results while typically paying large upfront fees. [SA-54-2009](#).^{xi}

Comment: If you come across one of these companies, appropriate action needs to be taken. Appropriate action may include alerting the appropriate law enforcement agency and filing a Suspicious Activity Report.

FinCEN guidance on business customer's exemption from CTR requirements

The FinCEN issued guidance to assist banks in determining the appropriateness of exempting from currency transaction reporting requirements non-listed business customers that derive some portion of their annual gross revenues from ineligible business activities. [FIN-2009-G001](#).^{xii}

Comment: Please remember that exempting a business customer from CTRs does not exempt it from other BSA/AML recordkeeping or reporting requirements (e.g. SARs).

FTC grants delay of enforcing identity theft programs under red flag rule

The FTC will delay enforcement of the new "Red Flags Rule" until August 1, 2009, to give creditors and financial institutions more time to develop and implement written identity theft prevention programs. For entities that have a low risk of identity theft, such as businesses that know their customers personally, the Commission will soon release a template to help them comply with the law.

Comment: This announcement does not affect other federal agencies' (e.g. OCC, FDIC, and OTS) enforcement of the original November 1, 2008 compliance deadline for institutions subject to their oversight. This does not affect banks, savings banks, and other federally insured financial institutions. If you are reading this periodical, the announcement probably does not apply to your financial institution.

COMPLETE COMPLIANCE UPDATE

*Presented by
Chuck Lewis*

Chuck Lewis began his banking career over 27 years ago. For over 20 years, he was Director of Regulatory Services for UMB. In the fall of 2006, Chuck became Director for Risk Management Services for RSM McGladrey, Inc. in Kansas City. A Certified Regulatory Compliance Manager, Chuck frequently speaks at programs and delivers seminars for state banking associations. He is a witty and talented speaker who is able to entertain audiences with his comedian like delivery. Chuck is a current faculty member for the Barret School of Banking (Memphis), the Schools of Banking in Nebraska, the Missouri School of Banking and the Graduate School of Banking in Wisconsin.

LOCATIONS

August 12 - Topeka
August 13 - Wichita

OTS revises Examination Handbook to conform with Reg. Z and Reg. M amendments

[OTS Regulatory Bulletin 37-36](#)^{xiii} transmits revised Examination Handbook Sections 1305 and 1325, regarding the Truth in Lending Act and the Consumer Leasing Act, respectively. It incorporates recent amendments to Regulation Z and Regulation M, which implement these laws. The amendments address issues raised by the Electronic Signatures in Global and National Commerce (E-Sign) Act. The revised sections replace existing Sections 1305 and 1325.

Comment: This is from the Regulatory Bulletin: "A number of provisions in Regulation Z were revised to include common sense exceptions to the E-Sign Act requirement that information may only be provided electronically to consumers with their specific written consent. For example, where a consumer accesses a credit card application or solicitation in electronic form, the required disclosures may now be provided in electronic form without specifically obtaining the consumer's consent to do so. To provide institutions with adequate flexibility, other amendments to both Regulation Z and Regulation M clarify that electronic disclosures "may" rather than "must" be provided electronically when a consumer accesses an application electronically. To reduce regulatory burden, still other amendments permit institutions to provide consumers one copy of certain notices electronically, rather than two."

Restructuring of check processing operations in the Tenth, Eleventh, and Twelfth Districts

The Board of Governors (FRB) is amending the routing number guide to next-day availability checks and local checks in Regulation CC to delete the reference to the Seattle branch office of the Federal Reserve Bank of San Francisco and to reassign the Federal Reserve routing symbols currently listed under that office to the Los Angeles branch office of the Federal Reserve Bank of San Francisco. Effective date: June 20, 2009. The FRB is also amending the routing number guide to delete the reference to the Denver branch office of the Federal Reserve Bank of Kansas City and to reassign the routing symbols currently listed under that office to the Los Angeles branch office of the Federal Reserve Bank of San Francisco and to the head office of the Federal Reserve Bank of Dallas. Effective date: June 27, 2009. These amendments reflect the restructuring of check-processing operations within the Federal Reserve System. [Final Rule](#).^{xiv}

FDIC: Expansion of Ombudsman's Office to assist customers with loans at failed banks

The FDIC announced the creation of a new unit within the Office of the Ombudsman specifically designed to assist customers with loans at failed banks. This new unit will complement the extensive work that the FDIC conducts on behalf of the public, and is another effort to provide effective avenues to address questions or concerns of borrowers of failed banks. The FDIC has also produced a new [A Borrower's Guide to an FDIC Insured Bank Failure](#).^{xv} [Press Release](#).^{xvi}

Comment: Click [here](#) to access the contact information for the FDIC's Office of Ombudsman.

HUD and Treasury: Making Homes Affordable program update and progress report

On May 14th, Treasury and HUD provided a Making Home Affordable (MHA) program [update](#)^{xvii} and a [progress report](#)^{xviii} including additional details on Foreclosure Alternatives and Home Price Decline Protection Incentives. Foreclosure Alternatives are supposed to help to prevent costly foreclosures by providing incentives for servicers and borrowers to pursue short sales and deeds-in-lieu of foreclosure in cases where a borrower is eligible for a MHA modification but unable to complete the modification process. The program purportedly will assist homeowners who cannot afford to stay in their homes by helping them to avoid foreclosure and relocate to a home they can afford. Home Price Decline Protection Incentives provides additional payments based on recent home price declines, and is designed to incentivize

additional modifications in areas where home prices have been falling. By increasing MHA modifications and the use of alternatives to foreclosure, Treasury and HUD intend to reduce the negative impact of foreclosure and minimize damaging costs for financial institutions, borrowers and communities.

Comment: Check with your lawyer about the effect of accepting a deed in lieu of foreclosure; your bank may get the house, but be precluded from collecting the debt.

HUD withdraws “required use” definition

On May 11th, HUD withdrew, and announced its intent to propose revised language relating to, a narrow provision of the final RESPA rule that redefines a prohibited practice called “required use” where consumers are steered toward mortgage services provided by affiliated businesses. After a review of more than 1,200 public comments, HUD will propose a new “required use” definition. In the interim, HUD's existing 'required use' definition will remain in effect. Click [here](#)^{xix} to read the full text of HUD's notice to withdraw the “required use” definition.

On January 1, 2010, HUD will require that lenders and mortgage brokers provide consumers with a standard [Good Faith Estimate](#)^{xx} that HUD purports clearly discloses key loan terms and closing costs. Closing agents will also be required to provide borrowers a new [HUD-1 settlement statement](#)^{xxi} that clearly compares consumers' final and estimated costs. HUD hopes to promote comparison shopping, thereby saving consumers an average of nearly \$700.

Comment: Home builders fought hard against the withdrawn rule. If adopted, it would have meant that home builders could not offer incentives for buyers using certain affiliated lenders. This is not the last word on this; HUD will propose a new definition. Please review your bank’s policies on “required use” because they may include the prohibited practice known as steering.

FinCEN: Adobe transition Q&A guide

On June 27, 2009, FinCEN's BSA E-Filing system will transition from IBM PureEdge forms to Adobe forms, which impacts BSA E-Filing users in varying degrees. [BSA E-Filing System Adobe Transition Question and Answer Guide](#)^{xxii} provides the steps necessary to transition to the Adobe forms and explains the differences between the Adobe Reader and IBM PureEdge form viewers used with the BSA E-Filing application.

PUBLICATIONS, REPORTS, STUDIES, TESTIMONY & SPEECHES

- **OTS Cost of Funds**

The OTS released its current and historical cost of funds report. [Historical](#).^{xxiii}
[Current](#).^{xxiv}

- **FRB’s April and May editions of FedFlash**

The Federal Reserve Board (FRB) has issued its [April](#)^{xxv} and [May](#)^{xxvi} editions of FedFlash.^{xxvii} FedFlash provides information on day-to-day operations, providing banks with National and District updates regarding the FRB’s products and services, processes, technical protocols and contact information.

- **FRB’s April Beige Book**

The FRB issued its April [Beige Book](#)^{xxviii} on current economic conditions.

Comment: The report covers mid-February through the end of March.

- **OCC provides financial literacy resources**

On April 20th, the OCC published [Community Developments Investments](#),^{xxix} its on-line newsletter, which describes financial literacy initiatives that banks and their community partners are operating across the country. This edition highlights roles that banks can play in promoting financial stability through local partnership efforts. It features four programs that help banks and their community partners reach out to consumers to encourage better money management through savings and checking products: Bank on Cities, Operation Hope, America Saves, and the Department of the

Treasury's Community Financial Access Pilot. It also includes on-line resources for bankers to expand their financial literacy programs, including the Financial Literacy Update and the Financial Literacy Web Resource Directory.

- **OCC advice on modification & rescue scams**

The OCC issued a consumer advisory to help homeowners avoid scams that claim to help them save their homes, but instead can cause them to lose their homes and their money. [OCC Consumer Tips for Avoiding Mortgage Modification Scams and Foreclosure Rescue Scams](#).^{xxx}

Comment: This is good information to get into your customers' hands. In the guise of assisting homeowners, these crooks are taking the very money your customers need to make their mortgage payments.

- **OCC's Community Developments Insights on school-based bank savings programs**

This [Community Developments Insights](#)^{xxxii} report discusses how the school-based bank savings programs operate, explains their establishment in "nonbank branch" settings or as authorized bank branches, and describes the benefits and potential risks to banks participating in these programs. The information presented here was obtained mainly from national bankers active in school-based bank savings programs, nonprofit and trade associations, and state treasurers' offices.

- **National Business Continuity Guide**

The Federal Reserve Banks developed an online [National Business Continuity Guide](#)^{xxxiii} for use in the unlikely event of service interruption for any reason.

- **April 2009 Senior Loan Officer Opinion Survey on Bank Lending Practices**

The April 2009 Senior Loan Officer Opinion Survey on Bank Lending Practices addressed changes in the supply of, and demand for, loans to businesses and households over the previous three months. [Summary](#).^{xxxiiii} [Full Report](#).^{xxxiv}

- **Sheila Bair statement on "Too Big To Fail"**

On May 6, 2009, Sheila C. Bair Chairman, Federal Deposit Insurance Corporation made a [statement](#)^{xxxv} before the Committee on Banking, Housing and Urban Affairs, on regulating and resolving institutions considered "Too Big To Fail."

- **May FedFocus**

The May issue of [FedFocus](#)^{xxxvi} contains the latest Federal Reserve Financial Services news. Each edition keeps you informed about hot topics in the industry, as well as providing insight into the value of Federal Reserve Financial Services. This edition contains an article highlighting information from decision makers from the banking, payments, legal, regulatory and merchant communities for a wide-ranging discussion of payments system security threats and how those threats might best be addressed.

- **2008 OTS Fact Book**

The OTS's 2008 statistical profile of the thrift industry, [2008 Fact Book](#),^{xxxvii} was published in May.

- **Treasury releases monthly bank lending survey**

On May 15th, Treasury released results from its [monthly bank lending survey](#)^{xxxviii} for March with data from the top 21 recipients of government investments through the Capital Purchase Program. Overall, balance sheets continued to contract. Outstanding loan balances at these banks slipped 1 percent in March. The survey also collects information on originations, which rose by 27 percent.

- **Federal Reserve statistical release on charge-off and delinquency rates**

The Federal Reserve released its quarterly report entitled [Charge-Off and Delinquency Rates on Loans and Leases at Commercial Banks](#).^{xxxix}

- **OCC distributes CRA estimated median family incomes**

On May 11, the OCC distributing the U.S. Census and 2009 HUD estimated median family incomes for metropolitan statistical areas (MSAs), metropolitan divisions (MDs), and nonmetropolitan portions of each state. The U.S. Census data, which are based on 2000 income data, were updated in 2004 to reflect revisions made by the Office of Management and Budget to the definitions and boundaries of MSAs and MDs. These data are used to determine income levels of geographies in Community Reinvestment Act (CRA) performance evaluations. The annual HUD data are used to determine 2009 borrower income levels in CRA performance evaluations. [FFIEC Census and HUD Estimated MSA/MD Median Family Incomes for 2009 CRA/HMDA Reports.](#)^{x1}

- **OCC concurrently releases the latest annual updates for calendar year 2008**

The OCC concurrently releases the latest annual updates for calendar year 2008 of [Significant Legal, Licensing, and Community Development Precedents for National Banks, Annual,](#)^{xii} and [Activities Permissible for a National Bank, Cumulative,](#)^{xiii} which describe activities that are authorized for a national bank as part of, or incidental to, the business of banking.

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<http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20090508a1.pdf>

ⁱ http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?position=all&page=23289&dbname=2009_register

ⁱ http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?position=all&page=22639&dbname=2009_register

ⁱ http://www.frbsf.org/video/katrina/container.cfm?video_name=bankingforsafety_english.flv&video_width=320&video_height=240

ⁱ <http://www.philadelphiafed.org/publications/order-form/lessons-from-a-storm.cfm>

ⁱ <http://www.federalreserve.gov/newsevents/press/other/20090416b.htm>

ⁱ <http://www.federalreserve.gov/creditcardcalculator/>

ⁱ http://www.federalreserve.gov/creditcardcalculator/default_sp.aspx

ⁱ <http://www.fdic.gov/regulations/laws/rules/5000-1000.html#5000uniformpf>

ⁱ http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?position=all&page=17768&dbname=2009_register

ⁱ <http://www.fdic.gov/news/news/SpecialAlert/2009/sa09054.html>

ⁱ http://www.fincen.gov/statutes_regs/guidance/pdf/fin-2009-g001.pdf

ⁱ <http://files.ots.treas.gov/74853.pdf>

ⁱ <http://www.federalreserve.gov/newsevents/press/bcreg/bcreg20090504a1.pdf>

ⁱ <http://www.fdic.gov/bank/individual/failed/borrowers/index.html>

ⁱ <http://www.fdic.gov/news/news/press/2009/pr09065.html>

ⁱ <http://www.treas.gov/press/releases/docs/05142009FactSheet-MakingHomesAffordable.pdf>

ⁱ <http://www.treas.gov/press/releases/docs/05142009ProgressReport.pdf>

ⁱ <http://www.hud.gov/content/releases/respa-withdrawal.pdf>

ⁱ <http://www.hud.gov/content/releases/goodfaithestimate.pdf>

ⁱ <http://www.hud.gov/offices/hsg/ramh/res/hud1.pdf>

ⁱ <http://bsaefiling.fincen.treas.gov/news/BSA%20E-Filing%20Adobe%20Transition%20Questions%20and%20Answers%20Guide.pdf>

ⁱ <http://files.ots.treas.gov/230104.pdf>

ⁱ <http://files.ots.treas.gov/230094.pdf>

ⁱ <http://www.frbservices.org/fedflash/index.html>

ⁱ <http://www.frbservices.org/fedflash/index.html>

ⁱ <http://www.frbservices.org/fedflash/index.html>

ⁱ <http://www.federalreserve.gov/fomc/beigebook/2009/20090415/fullreport20090415.pdf>

ⁱ http://www.occ.gov/cdd/Ezines/spring09/cde09spring_index.htm

ⁱ <http://www.occ.gov/ftp/ADVISORY/2009-1.html>

ⁱ <http://www.occ.treas.gov/cdd/Insights-Schoolbasedbank.pdf>

ⁱ <http://www.frbservices.org/businesscontinuity/index.html>

ⁱ <http://www.federalreserve.gov/boarddocs/SnLoanSurvey/200905/>

ⁱ <http://www.federalreserve.gov/boarddocs/SnLoanSurvey/200905/fullreport.pdf>

ⁱ <http://www.fdic.gov/news/news/speeches/chairman/spmay0609.html>

ⁱ http://www.frbservices.org/fedfocus/archive_perspective/perspective_0509_01.html

ⁱ <http://files.ots.treas.gov/481152.pdf>

ⁱ <http://www.treas.gov/press/releases/tg135.htm>

ⁱ <http://www.federalreserve.gov/releases/chargeoff/>

ⁱ <http://www.occ.treas.gov/ftp/bulletin/2009-13a.pdf>

ⁱ <http://www.occ.treas.gov/sigpre.pdf>

ⁱ <http://www.occ.treas.gov/corpapps/bankact.pdf>

