



REPORT TO THE GOVERNOR AND LEGISLATURE
ON THE IMPLEMENTATION OF THE
BANKING "WILD CARD"

As required by Section 12-a of the New York State Banking Law

June 1, 2012

Superintendent of Financial Services
New York State Department of Financial Services



NEW YORK STATE
DEPARTMENT *of*
FINANCIAL SERVICES

June 1, 2012

The Honorable Andrew M. Cuomo
Governor
State of New York
Albany, NY 12224-0341

The Honorable Dean G. Skelos
Temporary President
New York State Senate
Albany, NY 12247

The Honorable Sheldon Silver
Speaker
New York State Assembly
Albany, NY 12248

The Honorable John Sampson
Minority Leader
New York State Senate
Albany, NY 12247

The Honorable Brian Kolb
Minority Leader
New York State Assembly
Albany, NY 12247

Dear Sirs:

Enclosed is the 2011 Wild Card report required by Section 12-a of the Banking Law.

Section 12-a of the Banking Law, commonly referred to as the "Wild Card" section, is intended to maintain and enhance the appeal of the New York State banking charter. It authorizes the Superintendent of Financial Services (Superintendent) to permit state-chartered banking organizations to exercise powers that are available to the corresponding federally-chartered institutions, but not expressly authorized by the State Banking Law.

Prior to October 3, 2011, Wild Card powers were exercised by the Banking Board, however that authority was transferred to the Superintendent following the adoption of the Financial Services Law, which abolished the Banking Board and merged the Banking and Insurance Departments to create the Department of Financial Services. Wild card regulations and resolutions adopted before that date remain in effect.

The Financial Services Law also created a State Charter Advisory Board to work with the Superintendent in retaining state-chartered banking institutions, encouraging federally-chartered institutions to convert to a state charter and promoting the state banking system.

The Superintendent's ability to extend federal institution powers to state-chartered or licensed banking organizations through regulatory action facilitates New York's ability to respond to the expansion of the powers and privileges of federally-chartered banks and thrifts. I believe the wild card powers authorized under the Banking Law are of great value to New York-chartered institutions and help maintain the attractiveness of the state charter compared to a federal charter.

No new Wild Card resolutions were adopted during 2011. Section 12-a is currently scheduled to sunset on September 10, 2014.

Sincerely,

Benjamin M. Lawskey
Superintendent of Financial Services

cc: Lawrence Schwartz, Secretary to the Governor
Mylan Denerstein, Counsel to the Governor
Senator Joseph Griffo, Chair, Senate Banks Committee
Senator Malcolm Smith, Ranking Minority Member, Senate Banks Committee
Assemblywoman Annette M. Robinson, Chair, Assembly Banks Committee
Assemblyman Andrew P. Raia, Ranking Minority Member, Assembly Banks Committee

Report Required by Section 12-a of the Banking Law on the Implementation of the “Wild Card” Banking Powers

INTRODUCTION

The banking system in the United States permits all banking institutions, including banks, trust companies, thrift associations, credit unions and branches of non-U.S. banks, to choose to operate under either a federal or state charter. The choice of a federal or state charter depends on many factors, including the scope of authorized banking powers, the cost of regulation, whether applicable laws (including consumer protection laws) are deemed to be reasonable, and whether the banking regulator is perceived to be reasonable and flexible. Of all these factors, one of the most important is the scope of authorized banking powers.

It is in New York State's best interest that New York State banking charters continue to provide powers that are competitive with the powers granted to federally-chartered institutions. This will help the State to retain institutions that currently are New York State chartered, encourage newly formed institutions to choose a New York State charter, and encourage some institutions with federal charters to convert to New York State charters. New York State-chartered institutions maintain their principal offices, and thus their senior executives and other employees, in New York. This ensures that important employment, credit and economic development decisions are made in New York. Federally-chartered institutions and non-New York State-chartered banks that branch into New York need not locate their principal offices here in order to conduct business in this state.

Prior to the enactment of the original Wild Card authority in 1997, certain banking powers of New York State-chartered institutions could only be expanded legislatively. State-chartered banking institutions were increasingly concerned that the State Legislature could not respond quickly enough to the expansion of the powers of federally-chartered institutions. The purpose of the Wild Card authority is to allow the Superintendent to react quickly to evolving federal banking regulations; when changes in federal statutes, regulations or interpretations grant powers to federally-chartered institutions that state-chartered institutions do not enjoy, the Superintendent may adopt a resolution permitting one or more state-chartered banking organizations of the same type to exercise the same powers.

No new Wild Card resolutions were adopted during 2011. Section 12-a is currently scheduled to sunset on September 10, 2014.

ASSESSING CHARTER ACTIONS

1. Banks and Trust Companies

In the previous Wild Card Reports, the Banking Department chronicled charter actions since December 31, 1995. The purpose of noting charter changes since 1995 was to reflect the possible effect of the federal Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994, which abolished various federal legal barriers to full interstate banking and branching.

When a state-chartered banking institution operates or considers operating on an interstate basis, the institution must assess whether its strategic goals can be realized with a state charter or whether such goals require conversion to a federal charter. Prior to Riegle-Neal, a banking institution that engaged in interstate banking had to maintain separate charters and management organizational structures for each state in which it operated. In many instances, these chartered entities were state-chartered institutions either created de novo or acquired through acquisition or merger.

Riegle-Neal made it possible to conduct interstate business through a single entity with a unified management structure. However, before New York State's adoption of its Wild Card statute in 1997, any state-chartered bank making chartering decisions also knew that New York had no means, absent legislative action, to expeditiously conform State banking powers with powers that might be newly

granted by federal bank regulators. Industry comment at the time indicated that certain large regional banks did switch charters to facilitate their interstate banking operations.

In reports for years prior to 2004, we noted that when state-chartered banking institutions merged with federally-chartered or non-New York State-chartered commercial banks or trust companies there was no clear trend or preference whether to operate under a federal or state charter. However, as we noted in our report for 2004 (the year when JPMorgan Chase merged with Bank One and switched to a federal charter and HSBC also switched to a federal charter), the surviving charter in many bank mergers (and particularly interstate mergers) has often been the one perceived to be the most viable for interstate retail banking activities. A prime factor in the decision to choose a federal charter is the ability to conduct interstate banking activities on a uniform basis under the federal banking laws applicable to national banks and federal thrift associations.

It is possible that the pendulum is now swinging to a position more favorable for state charters. In June 2009, the U.S. Supreme Court, in the case of Cuomo v. Clearing House, upheld the right of state attorneys general to enforce state consumer protection laws of general application against national banks. Moreover, the Dodd-Frank Wall Street Reform and Consumer Protection Act (i) limits the ability of the Comptroller of the Currency to preempt state law, (ii) specifically precludes preemption for subsidiaries and affiliates of banks, and (iii) makes clear that State consumer protection laws may go beyond the rules established by the Bureau of Consumer Financial Protection. The Dodd-Frank Act may lessen the attractiveness of Federal banking charters as a lever to preempt state law, and increase the importance of factors other than preemption. That would make it even more important to ensure that the Superintendent is able to grant Wild Card powers to enable the state charter to provide the same banking powers as the Federal charter.

2. Thrift Institutions

In the 1999 report, the Department initiated reporting on chartering and conversion activities involving state-chartered thrift institutions. The conversion activity of state-chartered thrift institutions since that time has been varied. State-chartered thrift institutions have merged with both state-and federally-chartered thrifts and commercial banks, and also have converted into federal thrift institutions.

In a number of respects, the Home Owners Loan Act, which governs federal thrift banking activities, provided for even broader preemption of state laws affecting banking activities than the National Bank Act. Thus, persons interested in forming a thrift institution, even if they had no intention ever to engage in interstate banking activities, may have had the view that the federal thrift charter provided greater flexibility in the conduct of banking activities even with the existence of a Wild Card law applicable to state thrifts. On the other hand, the provisions of the Dodd-Frank Act abolishing the Office of Thrift Supervision and transferring its functions relating to federal savings associations to the Office of the Comptroller of the Currency may reduce the relative attractiveness of a federal thrift charter in this regard. As evidence of this development, we note that Elmira Savings Bank converted from a federal charter to a state charter, effective on December 31, 2011. In addition, a number of other, similar conversion applications are also pending.

There were 22 state thrifts as of the end of 2011, compared to 21 at the end of 2010. This increase was due to a conversion of Elmira savings Bank from a federal to state charter.

3. Credit Unions

Although credit unions did not become entitled to the benefits of the Wild Card Statute until 2007, they have long experienced the same charter decisions as banks and thrifts. At year-end 1996, New York had 24 state-chartered credit unions and 65 federally-chartered credit unions. At year-end 2011, there were 20 state-chartered credit unions with approximately \$6.1 billion of assets and 408 federally-chartered credit unions with about \$51.7 billion of assets.

The growth in federally-chartered credit unions is attributable to a lower level of taxation of such institutions. New York has begun to address this issue, and, as a result, the Department has begun to see some interest by federally-chartered credit unions possibly in converting to a state charter.

4. Foreign Branches and Agencies

In contrast, branches and agencies of foreign banks have found New York an attractive place to be licensed, despite the existence of a federal chartering option. At year-end 1996, there were 49 such State-chartered branches and agencies in New York with total assets of \$43 billion. As of year-end 2011, there were 103 such State-chartered branches and agencies in New York, with assets of over \$1.6 trillion and 29 federal branches and agencies with \$182 million in assets. Since few foreign banks engage in retail activities in the U.S., they are attracted to New York because of its status as a global capital market. Nevertheless, while New York still boasts 80 percent of all financial assets of foreign branches and agencies in the U.S., it must continue to make its regulatory scheme attractive to foreign banks in order to maintain its position as a global leader in the financial markets.

This Report is divided into the following Sections:

- Section I: Listing of state-chartered banking institutions (including banks, thrifts, credit unions and foreign bank branches/agencies) that have been retained, established or converted to federally-chartered banking institutions or have been acquired by or merged with another banking institution, during the year ended December 31, 2011
- Section II: Total employment of the banking sector in this state
- Section III: Total number of chartered banking institutions located in this state, including branches, and the total amount of deposits of such chartered or licensed banking institutions by type of federal, state or out-of-state state charter
- Section IV: Assessment of the impact of the provisions of section 12-a that apply to the insurance activities of state chartered banking institutions
- Appendix I: Comparison of New York State-Chartered Banking Organization on 12/31/10 and 12/31/11
- Appendix II: Summary and Text of "Wild Card" Resolutions Adopted from December 31, 2010 to December 31, 2011

SECTION I

Listing of New York State-chartered banking institutions that have been retained, established or converted to federally-chartered banking institutions, or have been acquired by or merged with another banking institution during the year ended December 31, 2011.

This section of the Report contains a chronological summary of all actions that affected the charter status of New York State-chartered banks, trust companies and thrift institutions occurring from January 1, 2011 through December 31, 2011. (The reported charter actions for the stated time period are determined by the date the affected institutions commenced or ceased operations, as the case may be, pursuant to the applicable charter action.)

(1) Savings Banks and Savings and Loans Associations State Charter Activity in 2011

- Elmira Saving Bank converted from a Federal to New York State Charter (effective 12/31/2011)

There were 21 state-chartered savings banks as of December 31, 2011, an increase of one since December 31, 2010. As to state-chartered savings and loan associations, the number remained unchanged over the same period. A full list of institutions as of year-end 2011 is contained in Appendix I.

(2) Commercial Bank and Trust Company Charter Activity in 2011

- Capital Bank and Trust Company merged into a state chartered institution (effective 04/11/2011)
- Hampton State Bank merged into a federally chartered institution (effective 05/27/2011)
- ICE Trust U.S. LLC converted to a federally chartered institution (effective 07/18/2011)

There were 86 state-chartered commercial banks and trust companies as of December 31, 2011, three fewer than as of December 31, 2010. A full list of institutions is contained in Appendix I.

(3) Credit Union Charter Activity in 2011

There were 20 state-chartered credit unions as of December 31, 2011, the same number as on December 31, 2010. A full list of institutions is contained in Appendix I.

(4) Foreign Bank Branch and Agency Activity in 2011

- Bank of Scotland Plc. established a new state-licensed branch (effective 09/20/2011).

There were 102 state-licensed foreign branches and agencies as of December 31, 2011, one more than at December 31, 2010. A full list of institutions is contained in Appendix I.

SECTION IITotal employment of the banking sector in the State

There is no definitive way to measure the total number of jobs created in New York State as a result of the establishment of new banks and trust companies or the number of jobs lost by virtue of conversions. Where a bank simply converts from a state to federal charter or federal charter to a state charter, there are not necessarily any job reductions or increases. Where charter action occurs as a result of a merger, job reductions often take place, as the merged entity typically rationalizes its business and management structure. This is particularly true for personnel associated with the management and "back-office" processing operations of the combined institution. This is less likely to be the case in regard to mergers between in-state and out-of-state institutions not conducting overlapping interstate banking operations.

SECTION III

Total number of chartered banking institutions located in New York, including branches, and the total amount of deposits, by type of federal, state or out-of-state state charter

Number of Headquarter Offices Represented in NY

State of Headquarters	Federal Chartered OCC Regulated	Federal Chartered Thrifts	State Chartered Not NY	State Chartered NY	Total
CA	2	-	6	-	8
CT	3	1	1	-	5
DE	2	1	-	-	3
FL	1	1	-	-	2
IL	-	-	-	-	-
MA	-	1	2	-	3
GA	1	-	-	-	1
MI	-	1	-	-	1
NC	1	-	-	-	1
NJ	3	1	4	-	8
NV	1	-	-	-	1
NY	46	40	-	95	181
OH	2	-	-	-	2
PA	2	-	5	-	7
RI	1	-	-	-	1
SD	1	-	-	-	1
TX	1	-	2	-	3
VA	2	1	-	-	3
Total	69	47	20	95	231

Number of Offices (Branches) Represented in NY

State of Headquarters	Federal Chartered OCC Regulated	Federal Chartered Thrifts	State Chartered Not NY	State Chartered NY	Total
CA	3	-	33	-	36
CT	40	38	2	-	80
DE	207	75	-	-	282
FL	1	1	-	-	2
IL	-	-	-	-	-
MA	-	2	26	-	28
GA	2	-	-	-	2
MI	-	1	-	-	1
NC	379	-	-	-	379
NJ	33	29	7	-	69
NV	259	-	-	-	259
NY	715	417	-	1,102	2,234
OH	1,080	-	-	-	1,080
PA	7	-	26	-	33
RI	232	-	-	-	232
SD	86	-	-	-	86
TX	24	-	2	-	26
VA	658	3	-	-	661
Total	3,726	566	96	1,102	5,490

Deposits of Branches in NY (000 omitted)

State of Headquarters	Federal Chartered OCC Regulated	Federal Chartered Thrifts	State Chartered Not NY	State Chartered NY	Total
CA	958,638	-	5,408,176	-	6,366,814
CT	2,682,918	2,189,456	74,257	-	4,946,631
DE	20,438,119	7,775,140	-	-	28,213,259
FL	165,824	52,415	-	-	218,239
IL	-	-	-	-	-
MA	-	24,772	807,410	-	832,182
GA	-	-	-	-	-
MI	-	151,112	-	-	151,112
NC	65,843,253	-	-	-	65,843,253
NJ	1,908,022	3,965,770	187,422	-	6,061,214
NV	64,615,792	-	-	-	64,615,792
NY	45,293,937	31,160,530	-	214,613,217	291,067,684
OH	367,296,443	-	-	-	367,296,443
PA	2,986,346	-	931,349	-	3,917,695
RI	7,821,810	-	-	-	7,821,810
SD	19,201,649	-	-	-	19,201,649
TX	11,671	-	19,447	-	31,118
VA	105,366,412	-	-	-	105,366,412
					-
Total	704,590,834	45,319,195	7,428,061	214,613,217	971,951,307

All numbers in Section III are from 2011

SECTION IV

Assessment of the impact of the provisions of Banking Law Section 12-a that apply to the insurance activities of state chartered banking institutions

Section 12-a(7)(a) of the Banking Law promotes the important policy of functional regulation of bank insurance sales activities. Banks, trust companies, savings banks, and savings and loan associations (hereafter "banking institutions") exercise such powers subject to regulation by the Department of Financial Services and pursuant to all insurance laws, rules and regulations.

For the calendar year 2011, a total of 23 New York State-chartered banking institutions reported income from insurance activities.

As indicated in previous Wild Card Reports, the dollar level of income realized from these activities tends to be modest for both large and small institutions, but for certain institutions, it represented a large portion of total non-interest income. The table below provides a summary of insurance income for New York state-chartered banking institutions.

**State Chartered Commercial Banks, Trust Companies & Saving Banks
Insurance Brokerage Income**

Insurance As % of Non-interest Income	Total 2011	Total 2010	Less Than \$1 Bil Assets 2011	Less Than \$1 Bil Assets 2010	Greater Than \$1 Bil Assets 2011	Greater Than \$1 Bil Assets 2010
0%	71	73	55	58	16	15
0.01% to 5.00%	15	20	11	12	4	8
5.01% to 10.00%	4	-	2	-	2	-
10.01% to 15.00%	1	-	-	-	1	-
15.01% to 20.00%	-	-	-	-	-	-
20.01% to 40.00%	-	-	-	-	-	-
40.01% or more	3	3	3	3	-	-
Subtotal	94	96	71	73	23	23

Not Included - Do Not report Insurance Revenue

Limited Purpose Trust Cos	12	13
Saving and Loans	1	1
Foreign Branches With FDIC	6	6
Foreign Branches No FDIC	79	79
Foreign Agencies	16	16
Private Bankers	1	1
Credit Unions	20	20
Total Institutions	229	232

APPENDIX I**Listing of New York State-Chartered Banking Organizations on 12/31/10 and 12/31/11****Savings Banks**

	12/31/2010		12/31/2011	Change
1	Apple Bank For Savings	1	Apple Bank For Savings	
		2	Elmira Savings Bank	Converted to a State Charter
2	Emigrant Bank	3	Emigrant Bank	
3	Emigrant Savings Bank - Brooklyn/Queens	4	Emigrant Savings Bank - Brooklyn/Queens	
4	Emigrant Savings Bank - Long Island	5	Emigrant Savings Bank - Long Island	
5	Emigrant Savings Bank - Manhattan	6	Emigrant Savings Bank - Manhattan	
6	Emigrant Savings Bank-Bronx/Westchester	7	Emigrant Savings Bank-Bronx/Westchester	
7	First Central Savings Bank	8	First Central Savings Bank	
8	Fulton Savings Bank	9	Fulton Savings Bank	
9	New York Community Bank	10	New York Community Bank	
10	Oneida Savings Bank	11	Oneida Savings Bank	
11	Pathfinder Bank	12	Pathfinder Bank	
12	Pioneer Savings Bank	13	Pioneer Savings Bank	
13	Putnam County Savings Bank	14	Putnam County Savings Bank	
14	Rhinebeck Savings Bank	15	Rhinebeck Savings Bank	
15	Ridgewood Savings Bank	16	Ridgewood Savings Bank	
16	Rondout Savings Bank	17	Rondout Savings Bank	
17	Sawyer Savings Bank	18	Sawyer Savings Bank	
18	The North Country Savings Bank	19	The North Country Savings Bank	
19	Ulster Savings Bank	20	Ulster Savings Bank	
20	Watertown Savings Bank	21	Watertown Savings Bank	

Savings & Loans

1	Medina Savings and Loan Association	1	Medina Savings and Loan Association
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Commercial Banks and Trust Companies

12/31/2010	12/31/2011
1 Adirondack Bank	1 Adirondack Bank
2 Alden State Bank	2 Alden State Bank
3 Alma Bank	3 Alma Bank
4 Alpine Capital Bank	4 Alpine Capital Bank
5 Amalgamated Bank	5 Amalgamated Bank
6 Amerasia Bank	6 Amerasia Bank
7 American Community Bank	7 American Community Bank
8 American Stock Transfer & Trust Company, LLC	8 American Stock Transfer & Trust Company, LLC
9 Anthos Trust Company, LLC	9 Anthos Trust Company, LLC
10 Banco Popular North America	10 Banco Popular North America
11 Bank Leumi USA	11 Bank Leumi USA
12 Bank of Akron	12 Bank of Akron
13 Bank of Cattaraugus	13 Bank of Cattaraugus
14 Bank of Holland	14 Bank of Holland
15 Bank of Millbrook	15 Bank of Millbrook
16 Bank of Richmondville	16 Bank of Richmondville
17 Bank of Tokyo - Mitsubishi UFJ Trust Company	17 Bank of Tokyo - Mitsubishi UFJ Trust Company
18 Bank of Utica	18 Bank of Utica
19 Berkshire Bank Municipal Bank	19 Berkshire Bank Municipal Bank
20 BPD Bank	20 BPD Bank
21 Brown Brothers Harriman & Co.	21 Brown Brothers Harriman & Co.
22 Capital Bank & Trust Company	Merged into State Charter
23 Catskill Hudson Bank	22 Catskill Hudson Bank
24 Cattaraugus County Bank	23 Cattaraugus County Bank
25 CheckSpring Bank	24 CheckSpring Bank
26 Chemung Canal Trust Company	25 Chemung Canal Trust Company
27 Citizens Bank of Cape Vincent	26 Citizens Bank of Cape Vincent
28 Continental Stock Transfer & Trust Company	27 Continental Stock Transfer & Trust Company
29 Country Bank	28 Country Bank
30 Deutsche Bank Trust Company Americas	29 Deutsche Bank Trust Company Americas
31 Emigrant Mercantile Bank	30 Emigrant Mercantile Bank
32 Empire State Bank	31 Empire State Bank
33 Fiduciary Trust Company International	32 Fiduciary Trust Company International
34 First American International Bank	33 First American International Bank
35 Five Star Bank	34 Five Star Bank
36 Flushing Commercial Bank	35 Flushing Commercial Bank
37 Genesee Regional Bank	36 Genesee Regional Bank
38 Genesee Valley Trust Company	37 Genesee Valley Trust Company
39 Global Bank	38 Global Bank
40 Gold Coast Bank	39 Gold Coast Bank
41 The Goldman Sachs Bank USA	40 The Goldman Sachs Trust Company
42 Gotham Bank of New York	41 Gotham Bank of New York
43 Greene County Commercial Bank	42 Greene County Commercial Bank
44 Habib American Bank	43 Habib American Bank
45 Hamptons State Bank	Merged into Federal Charter
46 Hanover Community Bank	44 Hanover Community Bank
47 ICE Trust U.S. LLC	Converted to a Federal Regulator
48 Interaudi Bank	45 Interaudi Bank
49 Israel Discount Bank of New York	46 Israel Discount Bank of New York
50 Law Debenture Trust Company of New York	47 Law Debenture Trust Company of New York

12/31/2010	12/31/2011
51 Manufacturers and Traders Trust Company	48 Manufacturers and Traders Trust Company
52 Market Street Trust Company	49 Market Street Trust Company
53 Mitsubishi UFJ Trust & Banking Corporation (U.S.A.)	50 Mitsubishi UFJ Trust & Banking Corporation (U.S.A.)
54 Mizuho Corporate Bank (USA)	51 Mizuho Corporate Bank (USA)
55 Mizuho Trust & Banking Co. (USA)	52 Mizuho Trust & Banking Co. (USA)
56 New York Commercial Bank	53 New York Commercial Bank
57 New York Life Trust Company	54 New York Life Trust Company
58 Newbank	55 Newbank
59 OFI Trust Company	56 OFI Trust Company
60 Orange County Trust Company	57 Orange County Trust Company
61 Pathfinder Commercial Bank	58 Pathfinder Commercial Bank
62 PCSB Commercial Bank	59 PCSB Commercial Bank
63 Pioneer Commercial Bank	60 Pioneer Commercial Bank
64 Provident Municipal Bank	61 Provident Municipal Bank
65 WSB Municipal Bank	62 WSB Municipal Bank
66 Riverside Bank	63 Riverside Bank
67 Savoy Bank	64 Savoy Bank
68 Shinhan Bank America	65 Shinhan Bank America
69 Signature Bank	66 Signature Bank
70 Solvay Bank	67 Solvay Bank
71 State Bank of Chittenango	68 State Bank of Chittenango
72 State Bank of Long Island	69 State Bank of Long Island
73 Steuben Trust Company	70 Steuben Trust Company
74 The Adirondack Trust Company	71 The Adirondack Trust Company
75 The Bank of Castile	72 The Bank of Castile
76 The Bank of New York	73 The Bank of New York
77 The Bank of Nova Scotia Trust Company of New York	74 The Bank of Nova Scotia Trust Company of New York
78 The Berkshire Bank	75 The Berkshire Bank
79 The Depository Trust Company	76 The Depository Trust Company
80 The Northern Trust Company of New York	77 The Northern Trust Company of New York
81 Westchester Bank, The	78 Westchester Bank, The
82 Tioga State Bank	79 Tioga State Bank
83 Tompkins Trust Company	80 Tompkins Trust Company
84 United International Bank	81 United International Bank
85 United Orient Bank	82 United Orient Bank
86 USNY Bank	83 USNY Bank
87 Victory State Bank	84 Victory State Bank
88 The Warehouse Trust Company LLC	85 The Warehouse Trust Company LLC
89 Woori America Bank	86 Woori America Bank

Credit Unions

12/31/2010		12/31/2011	
1	AmeriCU Credit Union	1	AmeriCU Credit Union
2	Branch 6000 NALC Credit Union	2	Branch 6000 NALC Credit Union
3	Buffalo Service Credit Union	3	Buffalo Service Credit Union
4	CFCU Community Credit Union	4	CFCU Community Credit Union
5	Directors Choice Credit Union	5	Directors Choice Credit Union
6	Empire Branch 36 National Association of Letter Carriers Credit Union	6	Empire Branch 36 National Association of Letter Carriers Credit Union
7	Empire State Credit Union (Spring Valley)	7	Empire State Credit Union
8	Erie County Employees Credit Union	9	Erie County Employees Credit Union
9	Hudson River Community Credit Union	10	Hudson River Community Credit Union
10	Jamestown Post Office Employees' Credit Union	11	Jamestown Post Office Employees' Credit Union
11	Melrose Credit Union	12	Melrose Credit Union
12	Montauk Credit Union	13	Montauk Credit Union
13	Municipal Credit Union	14	Municipal Credit Union
14	Newspaper Employees Credit Union	15	Newspaper Employees Credit Union
15	Encompass Niagara Credit Union	8	Encompass Niagara Credit Union
16	Niagara Falls Penn Central Employees Credit Union	16	Niagara Falls Penn Central Employees Credit Union
17	Norton-Troy Employees Credit Union	17	Norton-Troy Employees Credit Union
18	Progressive Credit Union	18	Progressive Credit Union
19	The Niagara Frontier Federal Employees Credit Union	19	The Niagara Frontier Federal Employees Credit Union
20	Yonkers Postal Employees Credit Union	20	Yonkers Postal Employees Credit Union

Foreign Branches

12/31/2010	12/31/2011
1 Allied Irish Banks, p.l.c.	1 Allied Irish Banks, p.l.c.
2 Banca Monte dei Paschi di Siena S.p.A.	2 Banca Monte dei Paschi di Siena S.p.A.
3 Banco Bilbao Vizcaya Argentaria, S.A.	3 Banco Bilbao Vizcaya Argentaria, S.A.
4 Banco de La Nacion Argentina	4 Banco de La Nacion Argentina
5 Banco Del Estado de Chile	5 Banco Del Estado de Chile
6 Banco do Brasil, S.A.	6 Banco do Brasil, S.A.
7 Banco Espanol de Credito, S.A.	7 Banco Espanol de Credito, S.A.
8 Banco Espirito Santo de Investimento,S.A	8 Banco Espirito Santo de Investimento,S.A
9 Banco Espirito Santo, S.A.	9 Banco Espirito Santo, S.A.
10 Banco Popular de Puerto Rico	10 Banco Popular de Puerto Rico
11 Banco Santander, S.A.	11 Banco Santander, S.A.
12 Bank Hapoalim B.M.	12 Bank Hapoalim B.M.
13 Bank of Baroda	13 Bank of Baroda
14 Bank of India	14 Bank of India
15 Bank of Montreal	15 Bank of Montreal
	16 Bank of Scotland plc New State Charter
16 Barclays Bank PLC	17 Barclays Bank PLC
17 BNP Paribas	18 BNP Paribas
18 Caixa Geral de Depositos, S.A.	19 Caixa Geral de Depositos, S.A.
19 Chang Hwa Commercial Bank, Ltd.	20 Chang Hwa Commercial Bank, Ltd.
20 China Construction Bank Corporation	21 China Construction Bank Corporation
21 China Merchants Bank Co., Ltd	22 China Merchants Bank Co., Ltd
22 Chinatrust Commercial Bank, Ltd.	23 Chinatrust Commercial Bank, Ltd.
23 Commerzbank Aktiengesellschaft	24 Commerzbank Aktiengesellschaft
24 Cooperatieve Centrale Raiffeisen-Boeren Leenbank B.A., Rabobank Nederland	25 Cooperatieve Centrale Raiffeisen-Boeren Leenbank B.A., Rabobank Nederland
25 Credit Agricole Corporate and Investment Bank	26 Credit Agricole Corporate and Investment Bank
26 Credit Industriel et Commercial	27 Credit Industriel et Commercial
27 Credit Suisse AG	28 Credit Suisse AG
28 Depfa Bank plc	29 Depfa Bank plc
29 Deutsche Bank AG	30 Deutsche Bank AG
30 Dexia Credit Local S.A.	31 Dexia Credit Local S.A.
31 DnB NOR Bank ASA	32 DnB NOR Bank ASA
32 DZ Bank AG Deutsche Zentral- Genossenschaftsbank	33 DZ Bank AG Deutsche Zentral- Genossenschaftsbank
33 Eurohypo Aktiengesellschaft	34 Eurohypo Aktiengesellschaft
34 First Commercial Bank, Ltd.	35 First Commercial Bank, Ltd.
35 Fortis Bank S.A./N.V.	36 Fortis Bank S.A./N.V.
36 Habib Bank Limited	37 Habib Bank Limited
37 HSH Nordbank AG	38 HSH Nordbank AG
38 Industrial and Commercial Bank of China Limited	39 Industrial and Commercial Bank of China Limited

39	Industrial Bank of Korea	40	Industrial Bank of Korea
40	Intesa Sanpaolo S.p.A.	41	Intesa Sanpaolo S.p.A.
41	Itau Unibanco S.A.	42	Itau Unibanco S.A.
42	KBC Bank N.V.	43	KBC Bank N.V.
43	Kookmin Bank	44	Kookmin Bank
44	Land Bank of Taiwan Co., Ltd	45	Land Bank of Taiwan Co., Ltd
45	Landesbank Baden - Wurttemberg	46	Landesbank Baden - Wurttemberg
46	Landesbank Hessen - Thuringen Girozentrale	47	Landesbank Hessen - Thuringen Girozentrale
47	Lloyds TSB Bank plc	48	Lloyds TSB Bank plc
48	Malayan Banking Berhad	49	Malayan Banking Berhad
49	Mashreq Bank psc	50	Mashreq Bank psc
50	Mega International Commercial Bank Co., Ltd.	51	Mega International Commercial Bank Co., Ltd.
51	Mitsubishi UFJ Trust and Banking Corporation	52	Mitsubishi UFJ Trust and Banking Corporation
52	Mizuho Corporate Bank, Ltd.	53	Mizuho Corporate Bank, Ltd.
53	National Bank of Canada	54	National Bank of Canada
54	National Bank of Egypt	55	National Bank of Egypt
55	National Bank of Pakistan	56	National Bank of Pakistan
56	Natixis	57	Natixis
57	Norddeutsche Landesbank Girozentrale	58	Norddeutsche Landesbank Girozentrale
58	Nordea Bank Finland Plc	59	Nordea Bank Finland Plc
59	Nordea Bank Norge ASA	60	Nordea Bank Norge ASA
60	Philippine National Bank	61	Philippine National Bank
61	Shinhan Bank	62	Shinhan Bank
62	Skandinaviska Enskilda Banken	63	Skandinaviska Enskilda Banken
63	Societe Generale	64	Societe Generale
64	Standard Chartered Bank	65	Standard Chartered Bank
65	State Bank of India	66	State Bank of India
66	Sumitomo Mitsui Banking Corporation	67	Sumitomo Mitsui Banking Corporation
67	Svenska Handelsbanken AB	68	Svenska Handelsbanken AB
68	Swedbank (ForeningsSparbanken AB)	69	Swedbank (ForeningsSparbanken AB)
69	T.C. Ziraat Bankasi	70	T.C. Ziraat Bankasi
70	The Bank of Tokyo - Mitsubishi UFJ, Ltd.	71	The Bank of Tokyo - Mitsubishi UFJ, Ltd.
71	The Chiba Bank, Ltd.	72	The Chiba Bank, Ltd.
72	The Gunma Bank, Ltd.	73	The Gunma Bank, Ltd.
73	The Korea Development Bank	74	The Korea Development Bank
74	The Norinchukin Bank	75	The Norinchukin Bank
75	The Royal Bank of Scotland N.V.	76	The Royal Bank of Scotland N.V.
76	The Royal Bank of Scotland PLC	77	The Royal Bank of Scotland PLC
77	The Shizuoka Bank, Ltd.	78	The Shizuoka Bank, Ltd.
78	The Shoko Chukin Bank	79	The Shoko Chukin Bank
79	The Sumitomo Trust and Banking Company Limited	80	The Sumitomo Trust and Banking Company Limited
80	The Toronto-Dominion Bank	81	The Toronto-Dominion Bank

81	Turkiye Vakiflar Bankasi T.A.O.	82	Turkiye Vakiflar Bankasi T.A.O.
82	UniCredit Bank AG	83	UniCredit Bank AG
83	UniCredit S.p.A.	84	UniCredit S.p.A.
84	United Bank Limited	85	United Bank Limited
85	WestLB AG	86	WestLB AG

Foreign Agencies

	12/31/2010		12/31/2011
1	Banco de Bogota	1	Banco de Bogota
2	Banco Industrial de Venezuela, C.A.	2	Banco Industrial de Venezuela, C.A.
3	Banco Latinoamericano de Comercio Exterior, S.A.	3	Banco Latinoamericano de Comercio Exterior, S.A.
4	Bank Leumi Le-Israel B.M.	4	Bank Leumi Le-Israel B.M.
5	Bank of Taiwan	5	Bank of Taiwan
6	Beogradska Banka dd	6	Beogradska Banka dd
7	Canadian Imperial Bank of Commerce	7	Canadian Imperial Bank of Commerce
8	Hana Bank	8	Hana Bank
9	Hua Nan Commercial Bank, Ltd.	9	Hua Nan Commercial Bank, Ltd.
10	Jugobanka dd	10	Jugobanka dd
11	Oversea-Chinese Banking Corporation Limited	11	Oversea-Chinese Banking Corporation Limited
12	P.T. Bank Negara Indonesia (Persero) Tbk	12	P.T. Bank Negara Indonesia (Persero) Tbk
13	P.T. Bank Rakyat Indonesia (Persero)	13	P.T. Bank Rakyat Indonesia (Persero)
14	The Bank of Nova Scotia	14	The Bank of Nova Scotia
15	United Overseas Bank Limited	15	United Overseas Bank Limited
16	Woori Bank	16	Woori Bank

APPENDIX II

**Summary and Text of “Wild Card” Resolutions Adopted
from January 1, 2011 through December 31, 2011**

None