Comptroller of the Currency
Administrator of National Banks

Quarterly Journal

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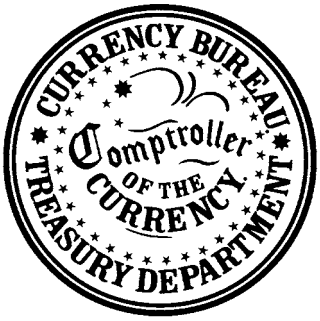

Office of the Comptroller of the Currency
Administrator of National Banks

John C. Dugan
Comptroller of the Currency

Volume 24, Number 3

September 2005
(Second quarter data)

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April [Interpretations and Actions]

1020, 2/8/2005, Letter concludes that national bank directors may meet the qualifying shares requirement under 12 USC 72 by purchasing trust preferred stock. [Note: Reprinted because of date error]

1024, 3/21/2005, Letter concludes that a national bank that renews a loan to an insider violates section 215.4(a)(1) of Regulation O and section 22(h)(A) of the Federal Reserve Act if the loan either (i) is preferential or (ii) involves more than the normal risk of repayment or presents other unfavorable features.

1025, 4/6/2005, Letter concludes that it is permissible for a national bank to engage in customer-driven electricity derivative transaction and hedges, settled in cash and by transitory title transfer, as activities part of, or incidental to, bank permissible financial intermediation transactions.

May [Interpretations and Actions]

1026, 4/27/2005, Letter concludes that the bank's proposed securities conduit lending services are legally permissible for a national bank.

1027, 5/3/2005, Letter confirms that the bank may purchase and hold the preferred securities of two special purpose entities that hold interests in Australian mortgage assets.

1028, 5/9/2005, Letter concludes that the OCC would not find a violation of 12 CFR 37.3(a) in connection with a national bank's automobile loan that includes a GAP feature offered by the bank because the OCC views the underlying loan and the GAP feature as a single product, and the financial arrangement does not create a separate product.

June [Interpretations and Actions]

1029, 5/23/2005, Letter grants a request for a waiver of certain provisions of the OCC's securities confirmation rules at 12 CFR Part 12 in connection with the bank's transfer agent activities for various dividend reinvestment, stock purchase, and employee stock purchase plans.

1030, 5/26/2005, Letter concludes that national bank may continue to hold a separate account bank-owned life insurance investment that in turns holds interests in instruments with characteristics of debt securities and a rate of return, a portion of which is linked to equity securities, provided the bank's examiner-in-charge has no supervisory objection.

1031, 1/19/1995, Letter concludes that a bank may create a trust to purchase and hold investments beyond those allowed for national banks without violating 12 USC 24(Seventh) and 12 CFR Part 1.

1032, 6/16/2005, Letter concludes that "GAP Addendums" sold by a national bank to borrowers in connection with the bank's motor vehicle loans, in connection with a GAP program administered by an insurance company, are debt cancellation contracts subject to 12 CFR Part 37.

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About the OCC

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September 2005

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Background

The Office of the Comptroller of the Currency (OCC) was established in 1863 as a bureau of the Department of the Treasury. The OCC is headed by the Comptroller, who is appointed by the President, with the advice and consent of the Senate, for a five-year term.

The OCC regulates national banks by its power to:

- Examine the banks;
- Approve or deny applications for new charters, branches, capital, or other changes in corporate or banking structure;
- Take supervisory actions against banks that do not conform to laws and regulations or that otherwise engage in unsound banking practices, including removal of officers, negotiation of agreements to change existing banking practices, and issuance of cease and desist orders; and
- Issue rules and regulations concerning banking practices and governing bank lending and investment practices and corporate structure.

The OCC divides the United States into four geographical districts, with each headed by a deputy comptroller.

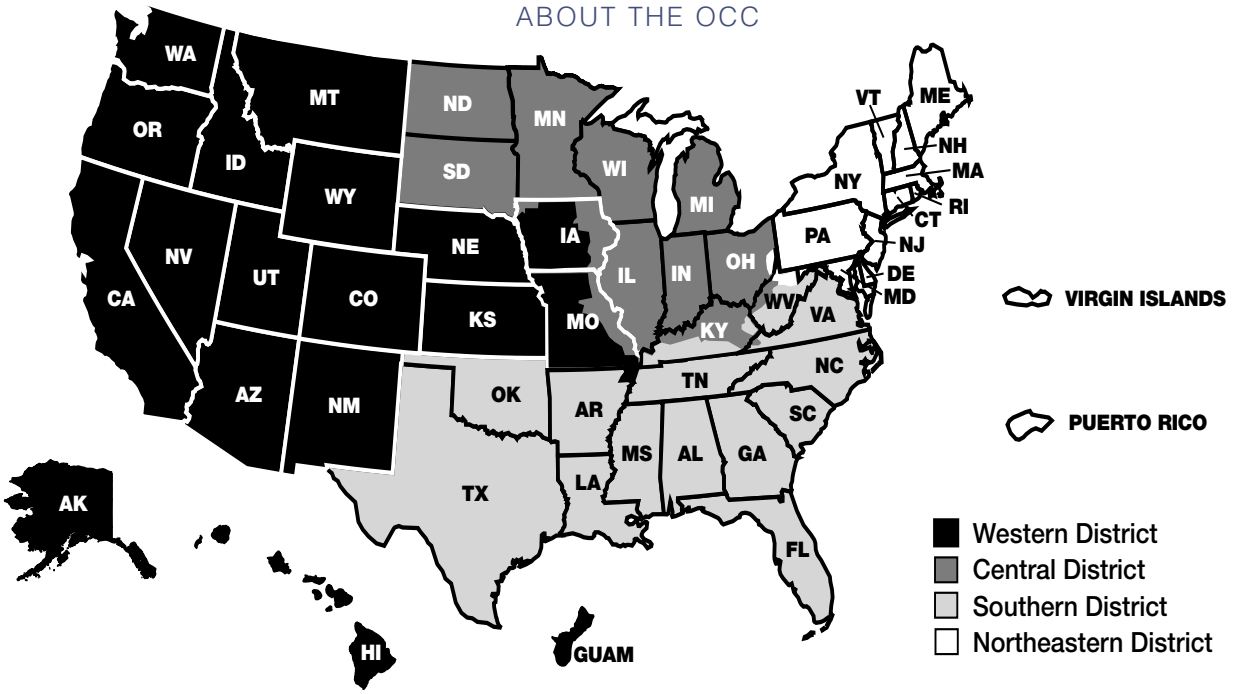
Th
Banking Act of 1978, the OCC regulates federal branches and agencies of foreign banks in the United States.

The Comptroller

John C. Dugan was sworn in as the 29th Comptroller of the Currency on August 4, 2005. Prior to his appointment as Comptroller, Mr. Dugan was a partner at the law firm of Covington & Burling, where he chaired the firm's Financial Institutions Group. He specialized in banking and financial institution regulation. He also served as outside counsel to the ABA Securities Association. He served at the Department of the Treasury from 1989 to 1993 and was appointed assistant secretary for domestic finance in 1992. While at Treasury, Mr. Dugan had extensive responsibility for policy initiatives involving banks and financial institutions, including the savings and loan cleanup, Glass-Steagall and banking reform, and regulation of government-sponsored enterprises. In 1991, he oversaw a comprehensive study of the banking industry that formed the basis for the financial modernization legislation proposed by the administration of the first President Bush. From 1985 to 1989, Mr. Dugan was minority counsel and minority general counsel for the U.S. Senate Committee on Banking, Housing, and Urban Affairs. There he advised the committee as it debated the Competitive Equality Banking Act of 1987, the Proxmire Financial Modernization Act of 1988, and the Financial Institutions Reform, Recovery, and Enforcement Act of 1989.

Among his professional and volunteer activities before becoming Comptroller, he served as a director of Minbanc, a charitable organization whose mission is to enhance professional and educational opportunities for minorities in the banking industry. He was also a member of the American Bar Association's committee on banking law, the Federal Bar Association's section of financial institutions and the economy, and the District of Columbia Bar Association's section of corporations, finance, and securities laws. A graduate of the University of Michigan in 1977 with an A.B. in English literature, Mr. Dugan also earned his J.D. from Harvard Law School in 1981.

The *Quarterly Journal* is the journal of record for significant actions and policies of the OCC. It is published four times a year, based on data released in March, June, September, and December. The *Quarterly Journal* is first released on the Web at www.occ.treas.gov/qj/qj.htm, and then, by subscription, on the CD-ROM *Quarterly Journal Library,* a cumulative collection starting with volume 17. The *Quarterly Journal* includes the press briefing on the condition and performance of commercial banks, statistical tables on the performance of FDIC-insured banks and OCC data on bank corporate structure, policy statements, decisions on banking structure, appeals to the ombudsman, links to selected speeches and congressional testimony and interpretive letters, summaries of enforcement actions, and other information of interest in the administration of national banks. Please send your comments and suggestions to Rebecca Miller, senior writer-editor, by fax to (202) 874-5263 or by e-mail to quarterlyjournal@occ.treas.gov. The subscription to the *Quarterly Journal Library* CD-ROM is available for $50 a year by writing to Publications—QJ, OCC, Attn: Accounts Receivable, MS 4-8, 250 E St., SW, Washington, DC 20219 [order form].



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Thank you for your interest in the *Quarterly Journal.* We welcome your comments on how to make this publication more informative for you. We are particularly interested in your comments on the usefulness of the information and its presentation. Please send your comments to Rebecca Miller, Senior Writer-Editor, OCC Publishing Services, by fax at (202) 874-5263 or by e-mail at quarterlyjournal@occ.treas.gov.

(revised July 2005)

Notice to Customers Making Payment by Check

Authorization to convert your check: If you present a check to make your payment, your check will be converted into an electronic fund transfer. “Electronic fund transfer” is the term used to refer to the process in which a business or government agency electronically instructs your financial institution to transfer funds from your account to its account, rather than processing your paper check. **By presenting your signed check to the OCC, you authorize the agency to copy the check and to use the account information from the check to make an electronic fund transfer from your account for the same amount as the check.** If the electronic fund transfer cannot be processed for technical reasons, you authorize the OCC to process the copy of your check.

Insufficient funds: The electronic fund transfer from your account will usually occur within 24 hours, which is faster than a check is normally processed. Therefore, make sure sufficient funds are available in your checking account when you send your check to the OCC. If the electronic fund transfer cannot be completed because of insufficient funds, the OCC may attempt the transfer two additional times.

Transaction information: The electronic fund transfer from your account will be on the account statement you receive from your financial institution. However, the transfer may be in a different place on your statement than the place where your check entries normally appear. For example, it may appear under **“other withdrawals”** or **“other transactions.”** You will not receive your original check back from your financial institution. For security reasons, the OCC will destroy your original check, but it will keep a copy of the check for record keeping.

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Condition and Performance of Commercial Banks

Condition and Performance of Commercial Banks

The condition of the banking industry report is not available in time for publication this quarter. The data tables, derived from the Federal Deposit Insurance Corporation call reports, for the key indicators and loan performance for both national banks and all commercial banks are provided here, as usual.

Key indicators, FDIC-insured national banks
Annual 2001--2004, year-to-date through June 30, 2005, second quarter 2004, and second quarter 2005
(Dollar figures in millions)

	2001	2002	2003	2004	Preliminary 2005YTD	2004Q2	Preliminary 2005Q2
Number of institutions reporting	2,138	2,077	1,999	1,906	1,864	1,957	1,864
Total employees (FTEs)	966,545	993,469	1,000,493	1,142,946	1,168,493	1,058,091	1,168,493
Selected income data ($)							
Net income	$44,172	$56,484	$62,995	$68,086	$37,479	$17,311	$17,958
Net interest income	125,366	141,377	143,148	159,215	84,635	38,586	42,249
Provision for loan losses	28,921	32,613	24,011	18,687	8,577	4,896	4,373
Noninterest income	100,094	109,531	116,164	127,313	72,671	30,866	35,815
Noninterest expense	131,736	136,822	144,938	170,819	93,524	39,242	47,662
Net operating income	42,943	54,341	60,625	65,717	37,115	16,881	17,523
Cash dividends declared	27,783	41,757	45,049	33,037	19,744	9,985	11,234
Net charge-offs	25,107	31,381	26,973	21,938	9,811	5,563	4,660
Selected condition data ($)							
Total assets	3,635,053	3,908,025	4,292,228	5,601,529	5,821,502	4,596,343	5,821,502
Total loans and leases	2,269,248	2,445,291	2,630,614	3,166,990	3,294,812	2,788,853	3,294,812
Reserve for losses	45,537	48,338	48,627	48,994	46,649	47,875	46,649
Securities	576,550	653,702	753,642	908,069	933,973	841,289	933,973
Other real estate owned	1,799	2,075	1,941	1,530	1,451	1,793	1,451
Noncurrent loans and leases	34,261	38,166	34,876	29,606	28,013	28,956	28,013
Total deposits	2,384,414	2,565,771	2,786,714	3,581,416	3,690,057	2,984,533	3,690,057
Domestic deposits	2,001,243	2,168,876	2,322,009	2,848,717	2,943,236	2,444,608	2,943,236
Equity capital	340,657	371,434	390,492	557,993	584,038	434,715	584,038
Off-balance-sheet derivatives	20,549,785	25,953,772	31,554,693	86,319,427	94,478,194	36,297,177	94,478,194
Performance ratios (annualized %)							
Return on equity	13.84	15.79	16.47	13.95	13.02	16.50	12.39
Return on assets	1.25	1.50	1.53	1.28	1.30	1.53	1.24
Net interest income to assets	3.56	3.76	3.47	3.00	2.95	3.41	2.92
Loss provision to assets	0.82	0.87	0.58	0.35	0.30	0.43	0.30
Net operating income to assets	1.22	1.44	1.47	1.24	1.29	1.49	1.21
Noninterest income to assets	2.84	2.91	2.82	2.40	2.53	2.73	2.47
Noninterest expense to assets	3.74	3.63	3.51	3.22	3.26	3.47	3.29
Loss provision to loans and leases	1.28	1.38	0.95	0.62	0.53	0.72	0.54
Net charge-offs to loans and leases	1.11	1.33	1.07	0.73	0.61	0.81	0.57
Loss provision to net charge-offs	115.19	103.93	89.02	85.18	87.42	88.01	93.85
Performance ratios (%)							
Percent of institutions unprofitable	7.48	6.93	5.60	5.30	4.99	6.08	5.26
Percent of institutions with earnings gains	56.83	71.21	55.93	63.12	62.23	57.28	62.34
Nonint. income to net operating revenue	44.40	43.65	44.80	44.43	46.20	44.44	45.88
Nonint. expense to net operating revenue	58.43	54.53	55.89	59.62	59.45	56.50	61.06
Condition ratios (%)							
Nonperforming assets to assets	1.01	1.06	0.89	0.57	0.51	0.69	0.51
Noncurrent loans to loans	1.51	1.56	1.33	0.93	0.85	1.04	0.85
Loss reserve to noncurrent loans	132.91	126.65	139.43	165.49	166.53	165.33	166.53
Loss reserve to loans	2.01	1.98	1.85	1.55	1.42	1.72	1.42
Equity capital to assets	9.37	9.50	9.10	9.96	10.03	9.46	10.03
Leverage ratio	7.81	7.88	7.70	7.31	7.37	7.48	7.37
Risk-based capital ratio	12.60	12.66	12.65	12.26	12.17	12.57	12.17
Net loans and leases to assets	61.17	61.33	60.15	55.66	55.80	59.63	55.80
Securities to assets	15.86	16.73	17.56	16.21	16.04	18.30	16.04
Appreciation in securities (% of par)	0.47	2.12	0.88	0.55	0.53	-0.74	0.53
Residential mortgage assets to assets	22.55	24.72	24.44	23.46	23.66	24.79	23.66
Total deposits to assets	65.60	65.65	64.92	63.94	63.39	64.93	63.39
Core deposits to assets	48.08	48.75	48.03	43.83	43.33	47.18	43.33
Volatile liabilities to assets	31.23	30.31	30.57	33.90	34.99	32.44	34.99

Loan performance, FDIC-insured national banks
Annual 2001--2004, year-to-date through June 30, 2005, second quarter 2004, and second quarter 2005
(Dollar figures in millions)

	2001	2002	2003	2004	Preliminary 2005YTD	2004Q2	Preliminary 2005Q2
Percent of loans past due 30-89 days							
Total loans and leases	1.38	1.14	1.02	0.87	0.77	0.83	0.77
Loans secured by real estate (RE)	1.42	1.07	0.91	0.75	0.70	0.75	0.70
1- to 4-family residential mortgages	1.84	1.45	1.30	1.05	0.98	1.10	0.98
Home equity loans	0.79	0.61	0.45	0.39	0.41	0.35	0.41
Multifamily residential mortgages	0.82	0.42	0.54	0.39	0.39	0.43	0.39
Commercial RE loans	0.85	0.58	0.47	0.44	0.37	0.40	0.37
Construction RE loans	1.28	0.91	0.66	0.61	0.54	0.61	0.54
Commercial and industrial loans	0.94	0.76	0.63	0.56	0.46	0.55	0.46
Loans to individuals	2.38	2.15	2.08	1.84	1.62	1.79	1.62
Credit cards	2.52	2.57	2.48	2.21	2.00	2.18	2.00
Installment loans and other plans	2.62	2.07	1.95	1.67	1.45	1.66	1.45
All other loans and leases	0.84	0.55	0.34	0.31	0.30	0.24	0.30
Percent of loans noncurrent							
Total loans and leases	1.51	1.56	1.33	0.93	0.85	1.04	0.85
Loans secured by real estate (RE)	1.05	0.97	0.95	0.68	0.72	0.79	0.72
1- to 4-family residential mortgages	1.06	1.02	1.14	0.86	0.97	0.97	0.97
Home equity loans	0.38	0.32	0.24	0.18	0.17	0.18	0.17
Multifamily residential mortgages	0.54	0.48	0.45	0.42	0.45	0.44	0.45
Commercial RE loans	1.02	1.05	0.97	0.71	0.70	0.86	0.70
Construction RE loans	1.15	1.03	0.71	0.44	0.44	0.60	0.44
Commercial and industrial loans	2.44	3.00	2.19	1.22	0.91	1.57	0.91
Loans to individuals	1.49	1.60	1.78	1.66	1.47	1.62	1.47
Credit cards	2.05	2.16	2.24	2.03	1.74	1.90	1.74
Installment loans and other plans	1.24	1.30	1.55	1.46	1.39	1.56	1.39
All other loans and leases	1.19	1.11	0.74	0.39	0.35	0.45	0.35
Percent of loans charged-off, net							
Total loans and leases	1.11	1.33	1.07	0.73	0.61	0.81	0.57
Loans secured by real estate (RE)	0.26	0.19	0.21	0.08	0.06	0.09	0.06
1- to 4-family residential mortgages	0.32	0.17	0.24	0.08	0.06	0.09	0.05
Home equity loans	0.35	0.23	0.23	0.10	0.09	0.14	0.09
Multifamily residential mortgages	0.04	0.11	0.03	0.04	0.05	0.13	0.07
Commercial RE loans	0.16	0.17	0.13	0.05	0.05	0.07	0.06
Construction RE loans	0.15	0.19	0.14	0.04	0.02	0.03	-0.02
Commercial and industrial loans	1.50	1.80	1.35	0.44	0.18	0.51	0.17
Loans to individuals	3.13	4.02	3.45	3.14	2.84	3.51	2.74
Credit cards	5.06	6.58	5.48	5.15	4.64	5.95	4.57
Installment loans and other plans	1.66	1.91	1.81	1.51	1.27	1.48	1.20
All other loans and leases	0.87	1.24	0.88	0.23	0.07	0.10	0.02
Loans outstanding ($)							
Total loans and leases	$2,269,248	$2,445,291	$2,630,614	$3,166,990	$3,294,812	$2,788,853	$3,294,812
Loans secured by real estate (RE)	976,094	1,139,263	1,254,981	1,572,071	1,665,892	1,358,784	1,665,892
1- to 4-family residential mortgages	472,680	573,669	605,100	745,212	781,378	630,795	781,378
Home equity loans	102,131	141,058	192,703	294,919	325,687	237,377	325,687
Multifamily residential mortgages	30,075	33,968	35,652	39,942	43,116	35,677	43,116
Commercial RE loans	236,489	253,427	269,936	301,700	308,484	285,178	308,484
Construction RE loans	91,437	95,361	104,218	128,622	148,272	114,715	148,272
Farmland loans	12,615	13,225	13,614	14,678	15,322	14,444	15,322
RE loans from foreign offices	30,668	28,556	33,758	46,998	43,633	40,598	43,633
Commercial and industrial loans	597,301	546,050	500,005	580,240	644,968	515,454	644,968
Loans to individuals	389,947	450,604	527,991	615,760	596,982	517,182	596,982
Credit cards*	166,628	209,971	250,893	300,351	274,667	235,816	274,667
Other revolving credit plans	29,258	33,243	32,883	34,258	34,586	32,200	34,586
Installment loans	194,060	207,390	244,215	281,151	287,729	249,165	287,729
All other loans and leases	307,851	311,822	349,521	401,143	388,862	399,391	388,862
Less: Unearned income	1,944	2,449	1,884	2,224	1,891	1,959	1,891

Key indicators, FDIC-insured national banks by asset size
Second quarter 2004 and second quarter 2005
(Dollar figures in millions)

	Less than $100M		$100M to $1B		$1B to $10B		Greater than $10B	
	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2
Number of institutions reporting	815	728	974	965	122	126	46	45
Total employees (FTEs)	18,831	16,371	93,733	90,038	85,593	86,738	859,934	975,346
Selected income data ($)								
Net income	$109	$108	$877	$873	$1,268	$1,351	$15,058	$15,626
Net interest income	426	391	2,503	2,533	3,105	3,024	32,553	36,301
Provision for loan losses	31	19	147	145	447	181	4,272	4,028
Noninterest income	162	140	1,342	1,235	2,281	2,319	27,080	32,120
Noninterest expense	416	371	2,505	2,455	3,023	3,150	33,298	41,687
Net operating income	109	109	876	874	1,261	1,345	14,635	15,196
Cash dividends declared	77	77	457	548	1,049	969	8,402	9,641
Net charge-offs	21	13	118	106	400	172	5,025	4,369
Selected condition data ($)								
Total assets	44,886	40,395	271,778	270,233	361,306	356,223	3,918,373	5,154,651
Total loans and leases	26,630	23,893	172,443	174,513	222,231	225,158	2,367,549	2,871,248
Reserve for losses	390	340	2,398	2,220	3,157	2,805	41,930	41,284
Securities	11,880	11,001	68,495	63,133	86,296	76,749	674,618	783,091
Other real estate owned	71	57	278	242	177	134	1,266	1,019
Noncurrent loans and leases	312	245	1,409	1,249	1,595	1,389	25,641	25,130
Total deposits	37,476	33,538	218,358	217,726	237,684	243,542	2,491,015	3,195,251
Domestic deposits	37,464	33,524	218,187	217,459	234,941	241,158	1,954,016	2,451,095
Equity capital	5,164	4,816	27,239	28,541	39,242	39,347	363,070	511,333
Off-balance-sheet derivatives	10	13	2,639	4,241	17,940	16,960	36,708,189	95,147,037
Performance ratios (annualized %)								
Return on equity	8.31	9.11	12.85	12.42	13.07	13.97	17.29	12.30
Return on assets	0.97	1.08	1.31	1.31	1.42	1.54	1.56	1.22
Net interest income to assets	3.81	3.91	3.73	3.79	3.48	3.44	3.38	2.83
Loss provision to assets	0.27	0.18	0.22	0.22	0.50	0.21	0.44	0.31
Net operating income to assets	0.98	1.08	1.30	1.31	1.41	1.53	1.52	1.18
Noninterest income to assets	1.45	1.40	2.00	1.85	2.56	2.64	2.81	2.50
Noninterest expense to assets	3.72	3.70	3.73	3.67	3.39	3.58	3.46	3.25
Loss provision to loans and leases	0.47	0.32	0.35	0.34	0.81	0.33	0.74	0.57
Net charge-offs to loans and leases	0.32	0.22	0.28	0.25	0.73	0.31	0.87	0.62
Loss provision to net charge-offs	147.04	143.20	124.70	137.00	111.85	105.29	85.01	92.21
Performance ratios (%)								
Percent of institutions unprofitable	11.41	9.89	2.05	2.18	4.92	3.97	0.00	0.00
Percent of institutions with earnings gains	53.01	58.38	58.83	63.63	66.39	76.98	76.09	57.78
Nonint. income to net operating revenue	27.56	26.36	34.90	32.78	42.36	43.40	45.41	46.95
Nonint. expense to net operating revenue	70.72	69.82	65.15	65.16	56.13	58.94	55.84	60.93
Condition ratios (%)								
Nonperforming assets to assets	0.86	0.75	0.62	0.55	0.49	0.43	0.71	0.52
Noncurrent loans to loans	1.17	1.02	0.82	0.72	0.72	0.62	1.08	0.88
Loss reserve to noncurrent loans	125.12	138.74	170.22	177.70	197.93	202.02	163.53	164.28
Loss reserve to loans	1.46	1.42	1.39	1.27	1.42	1.25	1.77	1.44
Equity capital to assets	11.51	11.92	10.02	10.56	10.86	11.05	9.27	9.92
Leverage ratio	11.40	11.85	9.46	9.63	9.29	9.06	7.13	7.09
Risk-based capital ratio	18.80	19.37	14.75	14.73	15.46	13.62	12.14	11.91
Net loans and leases to assets	58.46	58.31	62.57	63.76	60.63	62.42	59.35	54.90
Securities to assets	26.47	27.23	25.20	23.36	23.88	21.55	17.22	15.19
Appreciation in securities (% of par)	-0.81	-0.44	-0.79	-0.15	-0.56	-0.06	-0.75	0.66
Residential mortgage assets to assets	20.74	20.75	23.11	22.39	26.92	26.37	24.76	23.57
Total deposits to assets	83.49	83.03	80.34	80.57	65.78	68.37	63.57	61.99
Core deposits to assets	71.02	70.14	67.66	66.47	56.37	57.14	44.64	40.95
Volatile liabilities to assets	14.89	15.39	17.89	18.63	23.73	25.14	34.45	36.69

Loan performance, FDIC-insured national banks by asset size
Second quarter 2004 and second quarter 2005
(Dollar figures in millions)

	Less than $100M		$100M to $1B		$1B to $10B		Greater than $10B	
	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2
Percent of loans past due 30-89 days								
Total loans and leases	1.30	1.27	0.85	0.80	0.65	0.56	0.84	0.78
Loans secured by real estate (RE)	1.13	1.18	0.72	0.69	0.42	0.38	0.79	0.73
1- to 4-family residential mortgages	1.56	1.58	1.04	1.00	0.57	0.55	1.15	1.01
Home equity loans	0.51	0.65	0.33	0.38	0.25	0.26	0.36	0.41
Multifamily residential mortgages	0.93	0.40	0.50	0.54	0.29	0.17	0.43	0.42
Commercial RE loans	0.80	1.06	0.56	0.49	0.30	0.30	0.38	0.34
Construction RE loans	1.11	0.92	0.68	0.75	0.46	0.32	0.63	0.56
Commercial and industrial loans	1.58	1.40	0.94	1.02	0.98	0.96	0.47	0.39
Loans to individuals	2.35	2.25	1.80	1.55	1.53	1.00	1.80	1.64
Credit cards	1.93	1.98	3.32	2.67	2.51	1.75	2.15	2.00
Installment loans and other plans	2.40	2.30	1.53	1.44	1.09	0.92	1.69	1.47
All other loans and leases	0.73	0.66	0.59	0.53	0.36	0.47	0.22	0.29
Percent of loans noncurrent								
Total loans and leases	1.17	1.02	0.82	0.72	0.72	0.62	1.08	0.88
Loans secured by real estate (RE)	1.00	0.90	0.74	0.67	0.60	0.56	0.81	0.74
1- to 4-family residential mortgages	0.96	0.91	0.69	0.64	0.50	0.56	1.03	1.02
Home equity loans	0.11	0.48	0.15	0.15	0.18	0.17	0.18	0.17
Multifamily residential mortgages	0.65	1.01	0.52	0.53	0.27	0.34	0.45	0.46
Commercial RE loans	1.12	1.02	0.82	0.76	0.85	0.79	0.86	0.66
Construction RE loans	0.88	0.51	0.80	0.60	0.43	0.36	0.60	0.44
Commercial and industrial loans	2.05	1.71	1.20	0.99	1.04	0.84	1.65	0.91
Loans to individuals	0.82	0.80	0.81	0.57	0.97	0.51	1.68	1.53
Credit cards	1.68	1.12	2.64	1.73	2.23	1.32	1.88	1.75
Installment loans and other plans	0.79	0.81	0.45	0.43	0.34	0.39	1.71	1.50
All other loans and leases	1.18	0.95	0.68	0.71	0.50	0.47	0.44	0.33
Percent of loans charged-off, net								
Total loans and leases	0.32	0.22	0.28	0.25	0.73	0.31	0.87	0.62
Loans secured by real estate (RE)	0.07	0.07	0.06	0.08	0.10	0.08	0.10	0.06
1- to 4-family residential mortgages	0.08	0.05	0.07	0.05	0.11	0.06	0.09	0.05
Home equity loans	0.04	0.01	0.03	0.06	0.09	0.06	0.14	0.10
Multifamily residential mortgages	-0.01	0.81	0.03	0.18	0.52	0.08	0.07	0.05
Commercial RE loans	0.10	0.08	0.06	0.10	0.07	0.13	0.07	0.04
Construction RE loans	0.03	0.05	0.04	0.02	0.06	0.01	0.02	-0.03
Commercial and industrial loans	0.93	0.57	0.48	0.39	0.76	0.43	0.48	0.13
Loans to individuals	0.97	0.73	1.50	1.18	4.66	1.65	3.54	2.83
Credit cards	4.05	2.27	6.66	5.98	11.00	5.14	5.75	4.55
Installment loans and other plans	0.82	0.69	0.45	0.53	1.29	1.00	1.56	1.25
All other loans and leases	0.10	0.11	0.28	0.60	0.09	0.39	0.10	0.00
Loans outstanding ($)								
Total loans and leases	$26,630	$23,893	$172,443	$174,513	$222,231	$225,158	$2,367,549	$2,871,248
Loans secured by real estate (RE)	16,350	14,890	118,252	124,186	136,272	147,495	1,087,910	1,379,321
1- to 4-family residential mortgages	6,462	5,927	38,199	39,026	51,932	49,915	534,202	686,510
Home equity loans	531	506	7,201	6,961	10,350	12,252	219,295	305,968
Multifamily residential mortgages	433	335	4,419	4,135	5,066	7,004	25,760	31,642
Commercial RE loans	5,222	4,692	47,973	49,408	47,484	49,436	184,498	204,947
Construction RE loans	1,719	1,534	14,661	18,612	19,105	25,519	79,230	102,608
Farmland loans	1,983	1,897	5,796	6,042	1,753	2,466	4,913	4,918
RE loans from foreign offices	0	0	3	2	583	904	40,012	42,727
Commercial and industrial loans	4,290	3,749	28,091	27,507	44,248	48,711	438,826	565,001
Loans to individuals	3,050	2,436	16,122	13,663	24,022	20,014	473,988	560,869
Credit cards*	140	58	2,698	1,597	8,203	3,199	224,776	269,814
Other revolving credit plans	37	40	335	353	1,115	1,156	30,713	33,035
Installment loans	2,873	2,338	13,088	11,712	14,705	15,659	218,499	258,019
All other loans and leases	2,965	2,836	10,154	9,327	17,794	9,068	368,478	367,630
Less: Unearned income	24	19	176	170	106	131	1,653	1,572

Key indicators, FDIC-insured national banks by region
Second quarter 2005
(Dollar figures in millions)

	Northeast	Southeast	Central	Midwest	Southwest	West	All institutions
Number of institutions reporting	209	217	358	384	545	151	1,864
Total employees (FTEs)	318,326	270,402	299,475	161,044	78,710	40,536	1,168,493
Selected income data ($)							
Net income	$4,520	$5,661	$3,582	$2,194	$749	$1,252	$17,958
Net interest income	10,390	10,928	9,948	5,359	2,081	3,543	42,249
Provision for loan losses	2,077	(93)	307	615	100	1,366	4,373
Noninterest income	11,022	6,930	9,672	4,804	1,063	2,324	35,815
Noninterest expense	12,946	9,616	14,292	6,219	2,006	2,583	47,662
Net operating income	4,401	5,389	3,553	2,169	750	1,261	17,523
Cash dividends declared	2,760	2,150	2,270	864	486	2,704	11,234
Net charge-offs	2,067	147	683	630	71	1,062	4,660
Selected condition data ($)							
Total assets	1,373,255	1,671,734	1,752,618	530,813	235,825	257,257	5,821,502
Total loans and leases	767,714	878,233	909,390	398,027	148,478	192,970	3,294,812
Reserve for losses	13,754	8,681	11,682	5,629	1,705	5,198	46,649
Securities	243,679	371,005	184,885	51,254	50,763	32,388	933,973
Other real estate owned	136	313	535	190	230	47	1,451
Noncurrent loans and leases	8,636	3,699	8,469	4,214	1,063	1,932	28,013
Total deposits	890,816	1,096,593	1,022,301	368,978	177,476	133,893	3,690,057
Domestic deposits	499,423	962,677	836,557	340,634	174,895	129,050	2,943,236
Equity capital	145,883	163,682	161,287	59,190	22,421	31,576	584,038
Off-balance-sheet derivatives	22,711,585	23,644,198	47,325,309	693,294	63,420	40,389	94,478,194
Performance ratios (annualized %)							
Return on equity	12.54	14.01	8.88	15.03	13.60	15.58	12.39
Return on assets	1.34	1.36	0.82	1.65	1.29	1.97	1.24
Net interest income to assets	3.07	2.63	2.27	4.03	3.58	5.56	2.92
Loss provision to assets	0.61	-0.02	0.07	0.46	0.17	2.14	0.30
Net operating income to assets	1.30	1.30	0.81	1.63	1.29	1.98	1.21
Noninterest income to assets	3.26	1.67	2.20	3.61	1.83	3.65	2.47
Noninterest expense to assets	3.83	2.31	3.25	4.68	3.45	4.06	3.29
Loss provision to loans and leases	1.09	-0.04	0.14	0.62	0.27	2.87	0.54
Net charge-offs to loans and leases	1.09	0.07	0.30	0.63	0.20	2.23	0.57
Loss provision to net charge-offs	100.50	-62.84	44.99	97.74	140.02	128.68	93.85
Performance ratios (%)							
Percent of institutions unprofitable	7.18	6.45	2.79	4.17	5.50	8.61	5.26
Percent of institutions with earnings gains	65.07	69.12	56.70	58.59	64.04	65.56	62.34
Nonint. income to net operating revenue	51.48	38.81	49.30	47.27	33.80	39.62	45.88
Nonint. expense to net operating revenue	60.46	53.84	72.84	61.19	63.82	44.03	61.06
Condition ratios (%)							
Nonperforming assets to assets	0.64	0.25	0.53	0.83	0.55	0.77	0.51
Noncurrent loans to loans	1.12	0.42	0.93	1.06	0.72	1.00	0.85
Loss reserve to noncurrent loans	159.25	234.69	137.94	133.57	160.45	269.03	166.53
Loss reserve to loans	1.79	0.99	1.28	1.41	1.15	2.69	1.42
Equity capital to assets	10.62	9.79	9.20	11.15	9.51	12.27	10.03
Leverage ratio	8.02	6.56	6.71	8.49	8.38	10.29	7.37
Risk-based capital ratio	13.73	11.16	11.38	12.58	12.95	14.21	12.17
Net loans and leases to assets	54.90	52.01	51.22	73.92	62.24	72.99	55.80
Securities to assets	17.74	22.19	10.55	9.66	21.53	12.59	16.04
Appreciation in securities (% of par)	0.63	0.43	0.44	2.28	-0.44	0.31	0.53
Residential mortgage assets to assets	14.83	36.23	18.52	25.05	25.43	19.70	23.66
Total deposits to assets	64.87	65.60	58.33	69.51	75.26	52.05	63.39
Core deposits to assets	28.86	51.41	40.66	56.74	58.90	44.29	43.33
Volatile liabilities to assets	47.08	30.41	35.26	19.99	26.87	36.84	34.99

Loan performance, FDIC-insured national banks by region
Second quarter 2005
(Dollar figures in millions)

	Northeast	Southeast	Central	Midwest	Southwest	West	All institutions
Percent of loans past due 30-89 days							
Total loans and leases	0.93	0.52	0.76	0.87	0.68	1.24	0.77
Loans secured by real estate (RE)	0.72	0.59	0.82	0.74	0.61	0.65	0.70
1- to 4-family residential mortgages	0.91	0.81	1.21	1.09	0.92	1.08	0.98
Home equity loans	0.39	0.40	0.37	0.50	0.38	0.14	0.41
Multifamily residential mortgages	0.19	0.35	0.57	0.15	0.47	0.47	0.39
Commercial RE loans	0.34	0.24	0.53	0.30	0.48	0.35	0.37
Construction RE loans	0.40	0.44	0.73	0.68	0.42	0.39	0.54
Commercial and industrial loans	0.43	0.26	0.52	0.60	0.69	0.87	0.46
Loans to individuals	1.78	1.20	1.17	1.82	1.31	2.15	1.62
Credit cards	1.94	0.97	1.56	2.27	1.77	2.24	2.00
Installment loans and other plans	1.95	1.29	1.08	1.34	1.34	1.84	1.45
All other loans and leases	0.28	0.16	0.46	0.28	0.51	0.29	0.30
Percent of loans noncurrent							
Total loans and leases	1.12	0.42	0.93	1.06	0.72	1.00	0.85
Loans secured by real estate (RE)	0.64	0.32	1.06	1.16	0.72	0.42	0.72
1- to 4-family residential mortgages	0.47	0.33	1.65	2.08	1.08	0.44	0.97
Home equity loans	0.11	0.14	0.22	0.21	0.18	0.04	0.17
Multifamily residential mortgages	0.35	0.45	0.47	0.85	0.36	0.16	0.45
Commercial RE loans	0.76	0.48	1.00	0.66	0.70	0.49	0.70
Construction RE loans	0.40	0.38	0.56	0.37	0.47	0.39	0.44
Commercial and industrial loans	1.06	0.61	1.17	0.64	0.88	0.64	0.91
Loans to individuals	2.12	0.81	0.57	1.37	0.40	1.84	1.47
Credit cards	1.72	0.79	1.23	2.06	1.13	1.92	1.74
Installment loans and other plans	3.20	0.86	0.34	0.52	0.37	1.67	1.39
All other loans and leases	0.17	0.40	0.42	0.45	0.54	0.37	0.35
Percent of loans charged-off, net							
Total loans and leases	1.09	0.07	0.30	0.63	0.20	2.23	0.57
Loans secured by real estate (RE)	0.08	0.02	0.12	0.03	0.05	0.03	0.06
1- to 4-family residential mortgages	0.04	0.02	0.12	0.03	0.06	0.04	0.05
Home equity loans	0.04	0.05	0.16	0.09	0.11	0.00	0.09
Multifamily residential mortgages	0.28	0.00	0.03	0.00	0.05	0.16	0.07
Commercial RE loans	0.12	0.00	0.16	0.01	0.02	0.00	0.06
Construction RE loans	0.01	0.01	-0.04	-0.16	0.07	-0.01	-0.02
Commercial and industrial loans	0.24	-0.02	0.08	0.32	0.34	0.99	0.17
Loans to individuals	3.26	0.56	1.42	3.06	0.81	5.40	2.74
Credit cards	4.09	1.59	3.54	4.87	3.05	6.01	4.57
Installment loans and other plans	2.29	0.54	0.64	0.64	0.67	1.29	1.20
All other loans and leases	-0.20	0.14	0.09	0.10	0.34	-0.15	0.02
Loans outstanding ($)							
Total loans and leases	$767,714	$878,233	$909,390	$398,027	$148,478	$192,970	$3,294,812
Loans secured by real estate (RE)	256,227	544,476	457,064	232,962	96,188	78,975	1,665,892
1- to 4-family residential mortgages	115,323	290,649	207,622	103,616	30,842	33,325	781,378
Home equity loans	41,133	100,930	104,309	64,104	9,668	5,544	325,687
Multifamily residential mortgages	6,800	11,010	14,765	4,433	2,293	3,815	43,116
Commercial RE loans	42,405	89,374	82,304	38,651	30,757	24,991	308,484
Construction RE loans	11,302	46,883	42,491	17,533	19,911	10,152	148,272
Farmland loans	858	1,895	4,083	4,625	2,716	1,147	15,322
RE loans from foreign offices	38,406	3,736	1,491	0	0	0	43,633
Commercial and industrial loans	158,917	162,091	202,697	59,170	32,370	29,723	644,968
Loans to individuals	241,034	63,836	133,580	71,192	12,900	74,440	596,982
Credit cards	130,826	922	37,256	40,031	745	64,888	274,667
Other revolving credit plans	20,315	3,983	5,384	2,604	495	1,805	34,586
Installment loans	89,893	58,932	90,940	28,557	11,660	7,747	287,729
All other loans and leases	112,867	108,124	116,113	34,730	7,108	9,920	388,862
Less: Unearned income	1,330	295	64	26	88	89	1,891

Key indicators, FDIC-insured commercial banks
Annual 2001--2004, year-to-date through June 30, 2005, second quarter 2004, and second quarter 2005
(Dollar figures in millions)

	2001	2002	2003	2004	Preliminary 2005YTD	2004Q2	Preliminary 2005Q2
Number of institutions reporting	8,080	7,888	7,770	7,630	7,549	7,694	7,549
Total employees (FTEs)	1,701,721	1,745,614	1,759,517	1,814,491	1,849,134	1,815,328	1,849,134
Selected income data ($)							
Net income	$73,830	$89,722	$102,463	$104,631	$57,439	$26,642	$27,988
Net interest income	214,676	236,656	239,987	249,615	132,938	63,906	66,722
Provision for loan losses	43,337	48,195	34,837	26,219	11,398	6,640	5,898
Noninterest income	158,206	172,408	186,535	184,005	99,738	48,811	49,384
Noninterest expense	223,254	233,587	245,992	257,600	137,043	67,315	69,560
Net operating income	71,002	85,425	98,216	101,958	56,917	26,111	27,469
Cash dividends declared	54,228	67,536	77,838	55,681	30,171	17,002	16,355
Net charge-offs	36,474	44,538	37,933	29,154	12,479	7,462	6,002
Selected condition data ($)							
Total assets	6,552,421	7,076,584	7,601,170	8,413,084	8,724,590	8,050,205	8,724,590
Total loans and leases	3,884,336	4,156,181	4,428,850	4,904,746	5,129,186	4,672,547	5,129,186
Reserve for losses	72,273	76,999	77,151	73,525	70,711	75,418	70,711
Securities	1,172,540	1,334,826	1,456,312	1,551,287	1,585,315	1,559,157	1,585,315
Other real estate owned	3,569	4,165	4,218	3,373	3,222	3,915	3,222
Noncurrent loans and leases	54,578	60,550	52,949	42,079	39,861	44,897	39,861
Total deposits	4,377,558	4,689,852	5,035,056	5,592,812	5,794,697	5,334,345	5,794,697
Domestic deposits	3,748,042	4,031,815	4,293,884	4,726,920	4,899,529	4,506,714	4,899,529
Equity capital	593,696	647,448	691,903	850,265	892,275	742,251	892,275
Off-balance-sheet derivatives	45,325,982	56,208,607	71,098,899	87,872,661	96,200,813	81,023,600	96,200,813
Performance ratios (annualized %)							
Return on equity	13.09	14.47	15.31	13.80	13.12	14.63	12.68
Return on assets	1.15	1.33	1.40	1.31	1.34	1.34	1.29
Net interest income to assets	3.35	3.50	3.27	3.12	3.09	3.22	3.08
Loss provision to assets	0.68	0.71	0.48	0.33	0.27	0.33	0.27
Net operating income to assets	1.11	1.26	1.34	1.28	1.32	1.32	1.27
Noninterest income to assets	2.47	2.55	2.54	2.30	2.32	2.46	2.28
Noninterest expense to assets	3.48	3.46	3.35	3.22	3.19	3.39	3.21
Loss provision to loans and leases	1.12	1.21	0.82	0.56	0.45	0.58	0.47
Net charge-offs to loans and leases	0.95	1.12	0.89	0.63	0.50	0.65	0.47
Loss provision to net charge-offs	118.82	108.21	91.84	89.93	91.34	88.98	98.27
Performance ratios (%)							
Percent of institutions unprofitable	8.13	6.64	6.01	5.81	5.46	5.72	5.54
Percent of institutions with earnings gains	56.27	72.68	59.19	65.02	65.05	57.58	64.68
Nonint. income to net operating revenue	42.43	42.15	43.73	42.43	42.87	43.30	42.53
Nonint. expense to net operating revenue	59.87	57.10	57.67	59.41	58.90	59.72	59.91
Condition ratios (%)							
Nonperforming assets to assets	0.92	0.94	0.77	0.55	0.50	0.62	0.50
Noncurrent loans to loans	1.41	1.46	1.20	0.86	0.78	0.96	0.78
Loss reserve to noncurrent loans	132.42	127.17	145.71	174.73	177.39	167.98	177.39
Loss reserve to loans	1.86	1.85	1.74	1.50	1.38	1.61	1.38
Equity capital to assets	9.06	9.15	9.10	10.11	10.23	9.22	10.23
Leverage ratio	7.78	7.83	7.85	7.83	7.95	7.73	7.95
Risk-based capital ratio	12.70	12.77	12.75	12.62	12.56	12.73	12.56
Net loans and leases to assets	58.18	57.64	57.25	57.43	57.98	57.11	57.98
Securities to assets	17.89	18.86	19.16	18.44	18.17	19.37	18.17
Appreciation in securities (% of par)	0.82	2.22	0.84	0.43	0.33	-0.84	0.33
Residential mortgage assets to assets	21.64	23.30	23.28	23.29	23.78	23.73	23.78
Total deposits to assets	66.81	66.27	66.24	66.48	66.42	66.26	66.42
Core deposits to assets	48.72	48.68	48.63	47.56	47.04	48.01	47.04
Volatile liabilities to assets	31.45	31.41	30.95	31.68	32.54	32.51	32.54

Loan performance, FDIC-insured commercial banks
Annual 2001--2004, year-to-date through June 30, 2005, second quarter 2004, and second quarter 2005
(Dollar figures in millions)

	2001	2002	2003	2004	Preliminary 2005YTD	2004Q2	Preliminary 2005Q2
Percent of loans past due 30-89 days							
Total loans and leases	1.37	1.17	1.02	0.86	0.77	0.83	0.77
Loans secured by real estate (RE)	1.31	1.08	0.90	0.73	0.69	0.72	0.69
1- to 4-family residential mortgages	1.69	1.49	1.29	1.05	1.02	1.01	1.02
Home equity loans	0.79	0.59	0.45	0.37	0.39	0.34	0.39
Multifamily residential mortgages	0.72	0.46	0.48	0.36	0.36	0.36	0.36
Commercial RE loans	0.90	0.68	0.56	0.49	0.45	0.50	0.45
Construction RE loans	1.21	0.89	0.69	0.58	0.53	0.61	0.53
Commercial and industrial loans	1.01	0.89	0.72	0.64	0.55	0.66	0.55
Loans to individuals	2.46	2.22	2.08	1.82	1.58	1.76	1.58
Credit cards	2.70	2.72	2.53	2.24	1.96	2.24	1.96
Installment loans and other plans	2.54	2.08	1.93	1.62	1.43	1.57	1.43
All other loans and leases	0.84	0.58	0.48	0.38	0.35	0.33	0.35
Percent of loans noncurrent							
Total loans and leases	1.41	1.46	1.20	0.86	0.78	0.96	0.78
Loans secured by real estate (RE)	0.96	0.89	0.86	0.65	0.66	0.72	0.66
1- to 4-family residential mortgages	0.97	0.93	1.00	0.82	0.88	0.84	0.88
Home equity loans	0.37	0.30	0.24	0.18	0.18	0.18	0.18
Multifamily residential mortgages	0.46	0.38	0.38	0.35	0.37	0.37	0.37
Commercial RE loans	0.96	0.94	0.90	0.69	0.66	0.82	0.66
Construction RE loans	1.06	0.98	0.70	0.44	0.40	0.57	0.40
Commercial and industrial loans	2.41	2.93	2.10	1.17	0.93	1.62	0.93
Loans to individuals	1.43	1.51	1.53	1.46	1.28	1.37	1.28
Credit cards	2.12	2.24	2.22	2.00	1.70	1.89	1.70
Installment loans and other plans	1.12	1.14	1.14	1.12	1.07	1.12	1.07
All other loans and leases	0.97	1.01	0.66	0.40	0.36	0.44	0.36
Percent of loans charged-off, net							
Total loans and leases	0.95	1.12	0.89	0.63	0.50	0.65	0.47
Loans secured by real estate (RE)	0.19	0.15	0.17	0.08	0.06	0.09	0.06
1- to 4-family residential mortgages	0.22	0.14	0.19	0.08	0.06	0.09	0.06
Home equity loans	0.27	0.19	0.20	0.10	0.09	0.14	0.10
Multifamily residential mortgages	0.04	0.08	0.03	0.04	0.03	0.07	0.04
Commercial RE loans	0.13	0.15	0.13	0.07	0.05	0.08	0.07
Construction RE loans	0.14	0.17	0.14	0.05	0.02	0.05	0.01
Commercial and industrial loans	1.43	1.76	1.26	0.50	0.23	0.55	0.23
Loans to individuals	2.73	3.34	3.04	2.81	2.51	2.95	2.44
Credit cards	5.12	6.38	5.57	5.02	4.50	5.70	4.47
Installment loans and other plans	1.29	1.46	1.45	1.28	1.06	1.18	1.00
All other loans and leases	0.80	1.15	0.80	0.31	0.09	0.13	0.05
Loans outstanding ($)							
Total loans and leases	$3,884,336	$4,156,181	$4,428,850	$4,904,746	$5,129,186	$4,672,547	$5,129,186
Loans secured by real estate (RE)	1,800,228	2,068,153	2,272,850	2,624,802	2,817,582	2,462,648	2,817,582
1- to 4-family residential mortgages	810,781	945,708	994,156	1,083,208	1,161,553	1,056,501	1,161,553
Home equity loans	154,193	214,724	284,511	398,895	434,835	341,193	434,835
Multifamily residential mortgages	64,131	71,934	79,678	87,915	92,593	83,153	92,593
Commercial RE loans	505,882	555,990	602,724	667,070	697,110	635,475	697,110
Construction RE loans	193,014	207,452	231,510	290,040	337,900	256,102	337,900
Farmland loans	35,533	38,066	40,699	44,609	46,303	42,978	46,303
RE loans from foreign offices	36,695	34,280	39,572	53,066	47,289	47,248	47,289
Commercial and industrial loans	981,130	910,808	869,257	907,936	980,301	874,997	980,301
Loans to individuals	629,412	703,748	770,358	839,005	813,660	757,921	813,660
Credit cards*	232,448	275,957	316,014	371,687	338,523	298,094	338,523
Other revolving credit plans	34,202	38,209	37,556	39,159	39,613	36,604	39,613
Installment loans	362,762	389,582	416,788	428,160	435,523	423,223	435,523
All other loans and leases	476,689	476,873	519,254	536,210	520,568	579,901	520,568
Less: Unearned income	3,123	3,401	2,870	3,207	2,925	2,920	2,925

Key indicators, FDIC-insured commercial banks by asset size
Second quarter 2004 and second quarter 2005
(Dollar figures in millions)

	Less than $100M		$100M to $1B		$1B to $10B		Greater than $10B	
	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2
Number of institutions reporting	3,818	3,571	3,447	3,524	343	370	86	84
Total employees (FTEs)	75,354	68,893	301,454	299,504	226,847	233,874	1,211,673	1,246,863
Selected income data ($)								
Net income	$494	$484	$2,900	$3,188	$3,350	$3,485	$19,898	$20,830
Net interest income	1,885	1,815	8,691	9,400	8,168	8,664	45,162	46,843
Provision for loan losses	113	91	523	520	831	484	5,172	4,803
Noninterest income	475	442	3,309	3,169	5,079	4,894	39,949	40,879
Noninterest expense	1,628	1,549	7,555	7,753	7,462	7,861	50,670	52,396
Net operating income	491	486	2,885	3,187	3,304	3,475	19,431	20,322
Cash dividends declared	286	288	1,380	1,540	2,915	1,989	12,421	12,538
Net charge-offs	71	55	361	342	750	404	6,280	5,201
Selected condition data ($)								
Total assets	197,748	185,699	924,318	968,034	935,348	992,466	5,992,791	6,578,391
Total loans and leases	121,880	116,083	613,446	660,001	584,833	644,298	3,352,388	3,708,805
Reserve for losses	1,795	1,663	8,613	8,698	8,889	8,427	56,121	51,924
Securities	50,133	45,911	211,794	202,667	232,546	224,511	1,064,683	1,112,226
Other real estate owned	296	253	1,183	1,023	547	461	1,889	1,485
Noncurrent loans and leases	1,336	1,086	4,847	4,411	4,678	4,029	34,037	30,335
Total deposits	165,686	154,187	748,220	782,629	635,317	691,110	3,785,121	4,166,771
Domestic deposits	165,674	154,173	746,678	781,287	626,152	682,456	2,968,210	3,281,612
Equity capital	22,220	22,038	89,959	98,109	98,030	107,905	532,042	664,223
Off-balance-sheet derivatives	157	125	5,981	9,234	58,653	67,808	81,630,927	96,854,556
Performance ratios (annualized %)								
Return on equity	8.81	8.92	12.87	13.25	13.73	13.14	15.36	12.64
Return on assets	1.00	1.05	1.27	1.34	1.46	1.42	1.35	1.27
Net interest income to assets	3.83	3.95	3.81	3.94	3.56	3.54	3.06	2.86
Loss provision to assets	0.23	0.20	0.23	0.22	0.36	0.20	0.35	0.29
Net operating income to assets	1.00	1.06	1.26	1.34	1.44	1.42	1.32	1.24
Noninterest income to assets	0.97	0.96	1.45	1.33	2.21	2.00	2.71	2.50
Noninterest expense to assets	3.31	3.37	3.31	3.25	3.25	3.21	3.43	3.20
Loss provision to loans and leases	0.38	0.32	0.35	0.32	0.58	0.31	0.63	0.52
Net charge-offs to loans and leases	0.24	0.19	0.24	0.21	0.52	0.26	0.76	0.57
Loss provision to net charge-offs	157.99	166.19	145.05	151.88	110.81	119.78	82.37	92.35
Performance ratios (%)								
Percent of institutions unprofitable	9.35	9.61	2.09	1.84	2.33	2.70	3.49	0.00
Percent of institutions with earnings gains	54.37	57.77	59.94	70.29	65.60	77.84	73.26	65.48
Nonint. income to net operating revenue	20.11	19.59	27.58	25.21	38.34	36.09	46.94	46.60
Nonint. expense to net operating revenue	68.99	68.60	62.96	61.69	56.33	57.98	59.53	59.73
Condition ratios (%)								
Nonperforming assets to assets	0.83	0.72	0.65	0.56	0.56	0.45	0.62	0.49
Noncurrent loans to loans	1.10	0.94	0.79	0.67	0.80	0.63	1.02	0.82
Loss reserve to noncurrent loans	134.40	153.03	177.68	197.20	190.03	209.13	164.88	171.17
Loss reserve to loans	1.47	1.43	1.40	1.32	1.52	1.31	1.67	1.40
Equity capital to assets	11.24	11.87	9.73	10.13	10.48	10.87	8.88	10.10
Leverage ratio	11.15	11.77	9.37	9.61	9.32	9.46	7.11	7.36
Risk-based capital ratio	17.76	18.36	14.11	14.01	14.42	13.64	12.13	12.05
Net loans and leases to assets	60.73	61.62	65.44	67.28	61.58	64.07	55.00	55.59
Securities to assets	25.35	24.72	22.91	20.94	24.86	22.62	17.77	16.91
Appreciation in securities (% of par)	-0.76	-0.27	-0.77	-0.03	-0.86	-0.07	-0.86	0.50
Residential mortgage assets to assets	20.63	20.11	22.12	21.11	26.12	24.84	23.71	24.12
Total deposits to assets	83.79	83.03	80.95	80.85	67.92	69.64	63.16	63.34
Core deposits to assets	71.25	69.76	67.69	65.73	55.88	55.51	42.98	42.38
Volatile liabilities to assets	14.74	15.59	18.00	19.71	25.66	27.12	36.40	35.73

Loan performance, FDIC-insured commercial banks by asset size
Second quarter 2004 and second quarter 2005
(Dollar figures in millions)

	Less than $100M		$100M to $1B		$1B to $10B		Greater than $10B	
	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2	2004Q2	2005Q2
Percent of loans past due 30-89 days								
Total loans and leases	1.27	1.23	0.87	0.80	0.76	0.60	0.82	0.78
Loans secured by real estate (RE)	1.13	1.13	0.74	0.69	0.51	0.45	0.74	0.74
1- to 4-family residential mortgages	1.63	1.65	1.14	1.09	0.68	0.64	1.02	1.04
Home equity loans	0.53	0.50	0.36	0.39	0.33	0.33	0.34	0.40
Multifamily residential mortgages	0.53	0.53	0.47	0.47	0.23	0.25	0.38	0.36
Commercial RE loans	0.84	0.90	0.57	0.53	0.44	0.39	0.46	0.40
Construction RE loans	0.86	0.77	0.64	0.56	0.49	0.43	0.63	0.56
Commercial and industrial loans	1.52	1.38	1.01	1.01	1.03	0.85	0.51	0.42
Loans to individuals	2.37	2.29	1.90	1.75	1.95	1.20	1.71	1.59
Credit cards	2.37	1.95	4.42	3.44	3.04	1.15	2.13	1.98
Installment loans and other plans	2.40	2.33	1.64	1.63	1.50	1.29	1.54	1.39
All other loans and leases	0.72	0.68	0.60	0.51	0.44	0.45	0.30	0.32
Percent of loans noncurrent								
Total loans and leases	1.10	0.94	0.79	0.67	0.80	0.63	1.02	0.82
Loans secured by real estate (RE)	0.96	0.81	0.70	0.60	0.69	0.56	0.72	0.69
1- to 4-family residential mortgages	0.97	0.91	0.73	0.66	0.72	0.67	0.88	0.95
Home equity loans	0.20	0.22	0.19	0.19	0.21	0.19	0.18	0.17
Multifamily residential mortgages	0.55	0.47	0.58	0.44	0.28	0.24	0.32	0.40
Commercial RE loans	1.05	0.84	0.76	0.67	0.85	0.67	0.81	0.63
Construction RE loans	0.84	0.49	0.59	0.40	0.58	0.39	0.54	0.40
Commercial and industrial loans	1.71	1.48	1.19	1.00	1.17	0.92	1.76	0.91
Loans to individuals	0.95	0.88	0.80	0.68	0.93	0.50	1.46	1.39
Credit cards	1.57	1.17	2.88	1.95	2.01	0.94	1.87	1.73
Installment loans and other plans	0.95	0.89	0.56	0.57	0.41	0.37	1.28	1.23
All other loans and leases	1.08	0.91	0.81	0.67	0.57	0.62	0.39	0.30
Percent of loans charged-off, net								
Total loans and leases	0.24	0.19	0.24	0.21	0.52	0.26	0.76	0.57
Loans secured by real estate (RE)	0.06	0.06	0.07	0.06	0.09	0.06	0.09	0.06
1- to 4-family residential mortgages	0.09	0.07	0.08	0.05	0.09	0.07	0.09	0.05
Home equity loans	0.07	0.05	0.06	0.06	0.17	0.09	0.14	0.10
Multifamily residential mortgages	0.02	0.37	0.04	0.05	0.14	0.03	0.05	0.04
Commercial RE loans	0.05	0.06	0.07	0.07	0.09	0.08	0.07	0.06
Construction RE loans	0.01	0.05	0.04	0.02	0.04	0.01	0.06	0.00
Commercial and industrial loans	0.60	0.46	0.55	0.49	0.57	0.36	0.55	0.16
Loans to individuals	0.82	0.73	1.11	1.15	3.12	1.39	3.12	2.64
Credit cards	3.71	2.52	4.76	5.80	7.20	3.33	5.60	4.51
Installment loans and other plans	0.76	0.70	0.64	0.66	1.08	0.75	1.27	1.08
All other loans and leases	0.17	0.10	0.25	0.29	0.22	0.26	0.12	0.02
Loans outstanding ($)								
Total loans and leases	$121,880	$116,083	$613,446	$660,001	$584,833	$644,298	$3,352,388	$3,708,805
Loans secured by real estate (RE)	75,719	72,915	436,303	482,849	375,369	431,743	1,575,258	1,830,076
1- to 4-family residential mortgages	29,525	27,756	130,718	136,904	122,669	125,132	773,589	871,761
Home equity loans	2,569	2,541	25,151	26,300	29,549	35,311	283,923	370,682
Multifamily residential mortgages	1,753	1,614	16,612	17,230	19,176	24,173	45,611	49,576
Commercial RE loans	23,606	22,652	178,893	193,338	141,291	162,372	291,685	318,747
Construction RE loans	8,051	8,295	65,159	87,887	56,226	76,617	126,666	165,101
Farmland loans	10,215	10,057	19,733	21,160	5,500	7,181	7,530	7,904
RE loans from foreign offices	0	0	36	29	958	956	46,254	46,304
Commercial and industrial loans	19,785	18,541	98,648	102,629	109,564	122,216	647,000	736,916
Loans to individuals	12,590	11,107	49,073	45,013	63,527	61,027	632,732	696,513
Credit cards*	278	172	5,493	4,194	21,035	15,605	271,288	318,553
Other revolving credit plans	162	177	1,423	1,450	2,376	2,273	32,643	35,713
Installment loans	12,149	10,758	42,157	39,369	40,116	43,149	328,800	342,247
All other loans and leases	13,869	13,587	29,967	30,104	36,844	29,826	499,221	447,051
Less: Unearned income	82	67	545	594	471	514	1,823	1,750

Key indicators, FDIC-insured commercial banks by region
Second quarter 2005
(Dollar figures in millions)

	Northeast	Southeast	Central	Midwest	Southwest	West	All institutions
Number of institutions reporting	586	1,069	1,557	1,973	1,686	678	7,549
Total employees (FTEs)	465,575	462,562	423,756	218,458	165,237	113,546	1,849,134
Selected income data ($)							
Net income	$7,010	$8,096	$5,319	$2,876	$1,522	$3,165	$27,988
Net interest income	15,903	16,798	14,229	7,184	4,439	8,170	66,722
Provision for loan losses	2,429	382	493	703	206	1,686	5,898
Noninterest income	15,804	10,911	11,650	5,298	1,799	3,923	49,384
Noninterest expense	19,162	15,402	17,913	7,565	3,958	5,560	69,560
Net operating income	6,850	7,792	5,285	2,854	1,522	3,166	27,469
Cash dividends declared	4,080	3,236	3,356	1,205	845	3,635	16,355
Net charge-offs	2,474	509	855	697	150	1,317	6,002
Selected condition data ($)							
Total assets	2,142,699	2,418,842	2,279,091	721,030	478,658	684,271	8,724,590
Total loans and leases	1,149,149	1,393,603	1,268,756	532,763	301,146	483,770	5,129,186
Reserve for losses	19,188	15,123	16,089	7,530	3,746	9,035	70,711
Securities	480,163	506,460	283,615	89,699	112,154	113,224	1,585,315
Other real estate owned	294	789	961	408	587	184	3,222
Noncurrent loans and leases	11,538	6,467	11,011	5,176	2,223	3,446	39,861
Total deposits	1,408,354	1,630,628	1,412,102	518,878	374,360	450,375	5,794,697
Domestic deposits	922,509	1,474,058	1,200,348	490,534	371,662	440,418	4,899,529
Equity capital	227,448	243,796	211,168	78,765	47,089	84,009	892,275
Off-balance-sheet derivatives	23,982,283	23,852,727	47,469,594	696,666	65,172	134,371	96,200,813
Performance ratios (annualized %)							
Return on equity	12.48	13.47	10.11	14.82	13.17	15.09	12.68
Return on assets	1.33	1.35	0.93	1.60	1.29	1.87	1.29
Net interest income to assets	3.01	2.80	2.50	3.99	3.75	4.83	3.08
Loss provision to assets	0.46	0.06	0.09	0.39	0.17	1.00	0.27
Net operating income to assets	1.30	1.30	0.93	1.59	1.29	1.87	1.27
Noninterest income to assets	2.99	1.82	2.04	2.94	1.52	2.32	2.28
Noninterest expense to assets	3.63	2.56	3.14	4.20	3.35	3.29	3.21
Loss provision to loans and leases	0.86	0.11	0.16	0.53	0.28	1.42	0.47
Net charge-offs to loans and leases	0.87	0.15	0.27	0.53	0.20	1.11	0.47
Loss provision to net charge-offs	98.17	74.95	57.62	100.79	137.24	128.08	98.27
Performance ratios (%)							
Percent of institutions unprofitable	8.19	8.14	3.34	3.40	5.81	9.73	5.54
Percent of institutions with earnings gains	68.43	73.15	61.46	58.64	64.59	73.30	64.68
Nonint. income to net operating revenue	49.84	39.38	45.02	42.45	28.84	32.44	42.53
Nonint. expense to net operating revenue	60.44	55.58	69.22	60.61	63.44	45.98	59.91
Condition ratios (%)							
Nonperforming assets to assets	0.55	0.31	0.54	0.78	0.59	0.53	0.50
Noncurrent loans to loans	1.00	0.46	0.87	0.97	0.74	0.71	0.78
Loss reserve to noncurrent loans	166.30	233.86	146.12	145.49	168.46	262.19	177.39
Loss reserve to loans	1.67	1.09	1.27	1.41	1.24	1.87	1.38
Equity capital to assets	10.62	10.08	9.27	10.92	9.84	12.28	10.23
Leverage ratio	8.19	7.20	7.23	8.83	8.77	10.70	7.95
Risk-based capital ratio	13.91	11.50	11.66	12.90	13.57	14.25	12.56
Net loans and leases to assets	52.74	56.99	54.96	72.84	62.13	69.38	57.98
Securities to assets	22.41	20.94	12.44	12.44	23.43	16.55	18.17
Appreciation in securities (% of par)	0.24	0.43	0.26	1.21	-0.22	0.21	0.33
Residential mortgage assets to assets	19.99	32.98	19.30	23.09	25.00	17.95	23.78
Total deposits to assets	65.73	67.41	61.96	71.96	78.21	65.82	66.42
Core deposits to assets	33.42	52.59	44.70	59.37	62.12	54.37	47.04
Volatile liabilities to assets	44.71	28.61	32.68	19.42	24.02	27.71	32.54

Loan performance, FDIC-insured commercial banks by region
Second quarter 2005
(Dollar figures in millions)

	Northeast	Southeast	Central	Midwest	Southwest	West	All institutions
Percent of loans past due 30-89 days							
Total loans and leases	0.96	0.58	0.75	0.88	0.79	0.82	0.77
Loans secured by real estate (RE)	0.86	0.59	0.79	0.76	0.69	0.44	0.69
1- to 4-family residential mortgages	1.21	0.82	1.16	1.11	1.08	0.76	1.02
Home equity loans	0.36	0.37	0.38	0.52	0.37	0.21	0.39
Multifamily residential mortgages	0.18	0.38	0.53	0.28	0.45	0.27	0.36
Commercial RE loans	0.52	0.35	0.60	0.43	0.51	0.29	0.45
Construction RE loans	0.58	0.45	0.63	0.77	0.51	0.39	0.53
Commercial and industrial loans	0.50	0.36	0.58	0.74	0.83	0.76	0.55
Loans to individuals	1.75	1.41	1.18	1.82	1.55	1.71	1.58
Credit cards	1.92	2.19	1.56	2.27	1.68	2.01	1.96
Installment loans and other plans	1.83	1.36	1.11	1.44	1.59	1.15	1.43
All other loans and leases	0.38	0.19	0.44	0.38	0.60	0.30	0.35
Percent of loans noncurrent							
Total loans and leases	1.00	0.46	0.87	0.97	0.74	0.71	0.78
Loans secured by real estate (RE)	0.64	0.38	0.95	1.01	0.69	0.39	0.66
1- to 4-family residential mortgages	0.60	0.43	1.47	1.81	0.90	0.40	0.88
Home equity loans	0.13	0.14	0.23	0.22	0.19	0.09	0.18
Multifamily residential mortgages	0.19	0.50	0.49	0.62	0.47	0.08	0.37
Commercial RE loans	0.70	0.48	0.92	0.68	0.73	0.47	0.66
Construction RE loans	0.49	0.32	0.52	0.40	0.44	0.30	0.40
Commercial and industrial loans	1.11	0.63	1.08	0.77	0.97	0.91	0.93
Loans to individuals	1.92	0.83	0.55	1.32	0.55	1.28	1.28
Credit cards	1.76	1.40	1.22	2.07	1.04	1.68	1.70
Installment loans and other plans	2.45	0.78	0.35	0.54	0.54	0.45	1.07
All other loans and leases	0.21	0.37	0.40	0.50	0.81	0.43	0.36
Percent of loans charged-off, net							
Total loans and leases	0.87	0.15	0.27	0.53	0.20	1.11	0.47
Loans secured by real estate (RE)	0.07	0.03	0.11	0.04	0.06	0.03	0.06
1- to 4-family residential mortgages	0.03	0.03	0.12	0.03	0.08	0.03	0.06
Home equity loans	0.03	0.07	0.15	0.11	0.11	0.00	0.10
Multifamily residential mortgages	0.10	0.01	0.03	0.01	0.06	0.03	0.04
Commercial RE loans	0.09	0.02	0.13	0.05	0.06	0.05	0.07
Construction RE loans	0.09	0.01	0.00	-0.11	0.05	0.00	0.01
Commercial and industrial loans	0.19	0.11	0.15	0.32	0.40	0.71	0.23
Loans to individuals	3.12	1.05	1.31	2.87	0.80	3.76	2.44
Credit cards	4.22	4.05	3.57	4.90	2.99	5.24	4.47
Installment loans and other plans	1.95	0.54	0.62	0.61	0.68	0.63	1.00
All other loans and leases	-0.10	0.15	0.10	0.09	0.27	0.02	0.05
Loans outstanding ($)							
Total loans and leases	$1,149,149	$1,393,603	$1,268,756	$532,763	$301,146	$483,770	$5,129,186
Loans secured by real estate (RE)	471,494	897,383	679,702	319,548	202,857	246,598	2,817,582
1- to 4-family residential mortgages	211,533	410,555	276,561	127,310	64,082	71,513	1,161,553
Home equity loans	60,851	144,979	131,357	68,340	12,929	16,378	434,835
Multifamily residential mortgages	18,608	20,021	24,946	7,244	4,977	16,796	92,593
Commercial RE loans	108,212	189,809	159,178	69,981	71,958	97,972	697,110
Construction RE loans	30,751	120,530	75,298	31,337	40,938	39,044	337,900
Farmland loans	1,961	5,930	10,840	15,336	7,973	4,263	46,303
RE loans from foreign offices	39,578	5,558	1,522	0	0	632	47,289
Commercial and industrial loans	225,320	238,230	288,056	83,164	57,242	88,290	980,301
Loans to individuals	298,437	124,751	159,472	80,234	26,622	124,144	813,660
Credit cards	155,124	17,589	38,247	41,613	1,339	84,613	338,523
Other revolving credit plans	21,324	6,038	6,033	2,767	745	2,706	39,613
Installment loans	121,989	101,124	115,192	35,854	24,538	36,825	435,523
All other loans and leases	155,422	133,756	141,674	49,871	14,624	25,222	520,568
Less: Unearned income	1,524	516	148	54	199	484	2,925

Recent Licensing Decisions

Recent Licensing Decisions

Cases Published during April, May, and June 2005

CRA Decisions

On April 25, 2005, the OCC conditionally approved the application to combine Riggs Bank National Association, McLean, VA, with PNC Bank, National Association, Pittsburgh, PA. The OCC received comments from one community organization expressing Community Reinvestment Act (CRA) concerns. Based on both banks' "outstanding" rating in their latest CRA public evaluations and other analyses and information considered, the OCC found approval consistent with the CRA. [Conditional Approval No. 687]

Change in Bank Control

On March 4, 2005, the OCC did not disapprove Change in Bank Control Notices filed in connection with the proposed acquisition of First National Bank of Marin, Las Vegas, NV (collectively, "notices"), by Sherman Financial Group LLC, Radian Group, Inc., and MGIC Investment Corporation. The OCC's action is expressly conditioned on compliance with the agreement made in connection with these notices between Sherman Financial Group LLC and the OCC dated February 25, 2005, which agreement may be enforced under 12 USC 1818. [Corporate Decision No. 2005-01]

Mergers

On April 11, 2005, the OCC conditionally approved the application to establish Atlantic Trust, National Association, Chicago, IL (Interim Bank), and the subsequent merger of Atlantic Trust Company, National Association, Boston, MA, and Atlantic Trust Co., National Association, District of Columbia, into Atlantic Trust, National Association ("bank"), under the charter number of the latter and with the title of "Atlantic Trust, National Association." This conditional approval was subject to several conditions including within 30 days after consummating the mergers, the board of directors of the bank shall execute a formal agreement with the OCC, the terms of which shall be subject to the OCC's discretion. [Conditional Approval No. 685]

Operating Subsidiaries

On March 24, 2005, the OCC approved the application by JPMorgan Chase Bank, National Association, New York, NY ("bank"), to acquire Vastera, Inc. ("Vastera") as an operating subsidiary of the bank. Vastera provides global trade management services. The OCC found that the activities performed by Vastera are part of the business of banking or incidental to the business of banking under 12 USC 24(Seventh) and the bank's systems and controls are sufficient to enable it to conduct the activities in a safe and sound manner. [Corporate Decision No. 2005-02]

Capital

On April 7, 2005, the OCC conditionally approved the application by First National Bank of Mayfield, Mayfield, KY ("bank"), to elect corporate governance provisions of Kentucky law and complete a reverse stock split in accordance with those provisions. This represents the first OCC approval of a reverse stock split conducted under Kentucky corporate governance procedures. This approval was subject to condition requiring the bank: to elect the corporate governance provisions of Kentucky law, provide for dissenters' rights comparable to those found in relevant statutes, pay the cost of any appraisal that may occur if any shareholders dissent, and pay for binding arbitration by an independent third party to appraise the stock if the appropriate court(s) decline to accept jurisdiction of an appraisal action. [Conditional Approval No. 683]

Special Supervision and Enforcement Activities

Special Supervision and Enforcement Activities

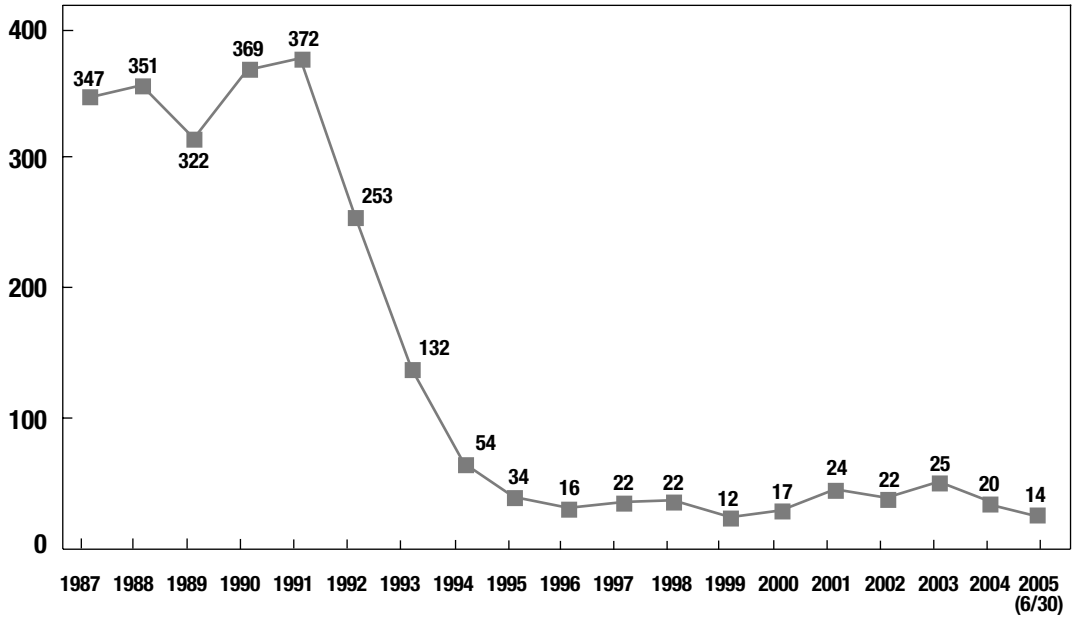
The Special Supervision Division of the Midsize and Community Bank Supervision Department supervises critical problem banks through rehabilitation or through other resolution processes such as orderly failure management or the sale, merger, or liquidation of such institutions. The Special Supervision Division monitors the supervision of delegated problem banks, coordinates safety and soundness examinations, provides training, analyzes and disseminates information, and supports OCC supervisory objectives as an advisor and liaison to OCC management and field staff on emerging problem bank-related issues.

This section includes information on problem national banks, national bank failures, and enforcement actions. Data on problem banks and bank failures is provided by OCC's Special Supervision Division and the FDIC's Department of Resolutions in Washington. Information on enforcement actions is provided by the Enforcement and Compliance Division (E&C) of the Law Department. The latter is principally responsible for presenting and litigating administrative actions on the OCC's behalf against banks requiring special supervision.

Problem National Banks and National Bank Failures

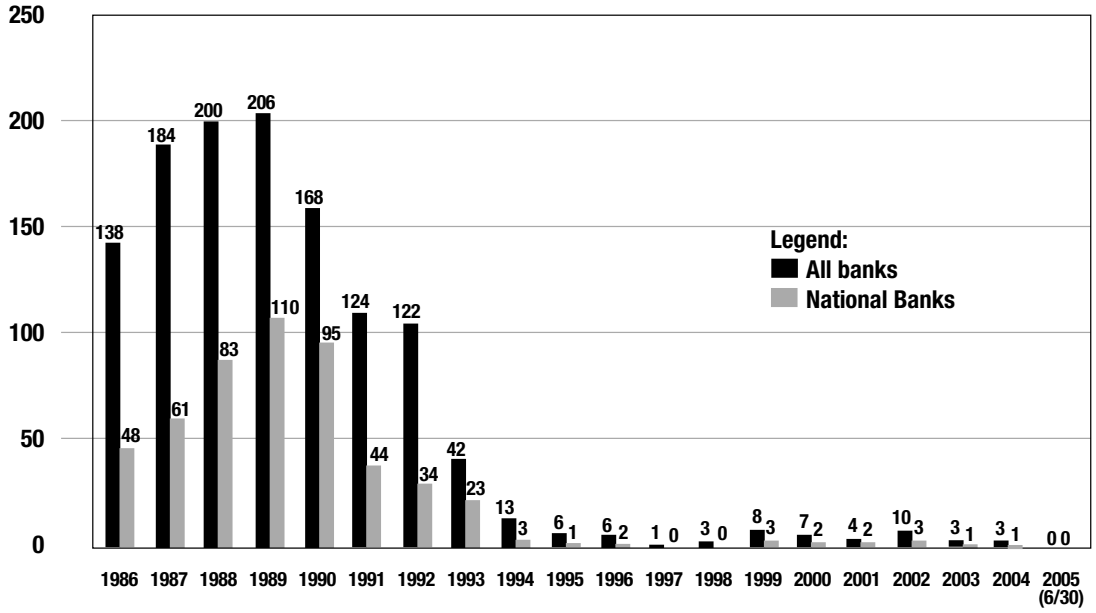
Problem banks represented less than 1 percent of the national bank population as of June 30, 2005. The volume of problem banks, those with a CAMELS rating of 4 or 5, has been stable for several years and declined in 2005. The CAMELS rating is the composite bank rating based on examiner assessment of capital, asset quality, management, earnings, liquidity, and sensitivity to market risk. The total number of problem banks is 14 at June 30, 2005. This low volume of problem banks reflects the stable economy and generally favorable economic conditions enjoyed for the past several years. No banks have failed as of June 30, 2005.

Figure 1—Problem national bank historical trend line



Source: Special Supervision

Figure 2—Number of bank failures



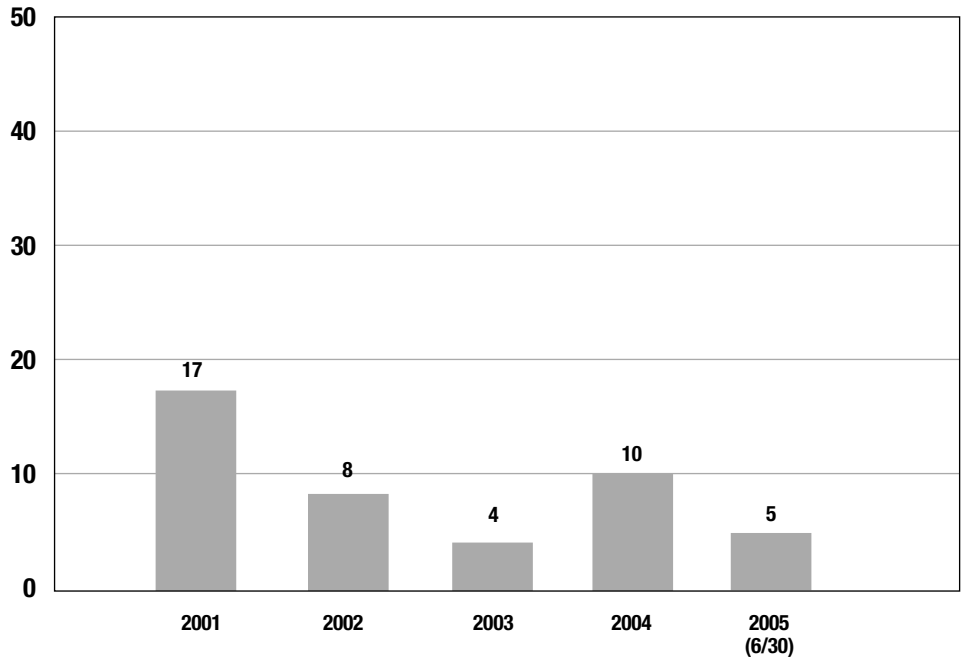
Source: Federal Deposit Insurance Corporation

Enforcement Actions

The OCC has a number of remedies with which to carry out its supervisory responsibilities. When it identifies safety and soundness or compliance problems, these remedies range from advice and moral suasion to informal and formal enforcement actions. These mechanisms are designed to achieve expeditious corrective and remedial action to return the bank to a safe and sound condition.

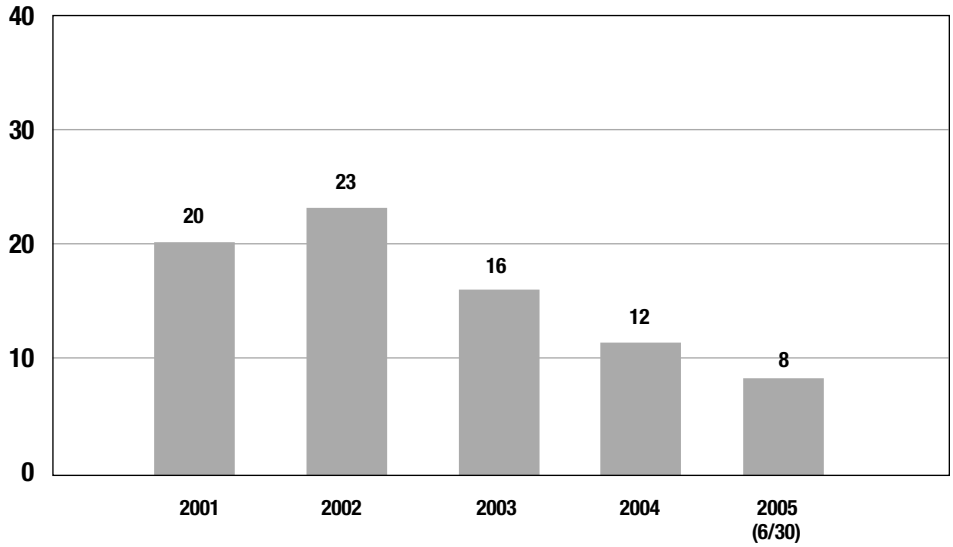
The OCC takes enforcement actions against national banks, parties affiliated with national banks, and servicing companies that provide data processing and other services to national banks. The OCC's informal enforcement actions against banks include commitment letters and memorandums of understanding (MOUs). Informal enforcement actions are meant to handle less serious supervisory problems identified by the OCC in its supervision of national banks. Failure to honor informal enforcement actions will provide strong evidence of the need for the OCC to take formal enforcement action. The charts below show total numbers of the various types of informal enforcement actions completed by the OCC against banks in the last several years.

Figure 3—Commitment letters



Source: OCC Systems. Note that totals for previous years' completed enforcement actions may be adjusted to reflect revised aggregates.

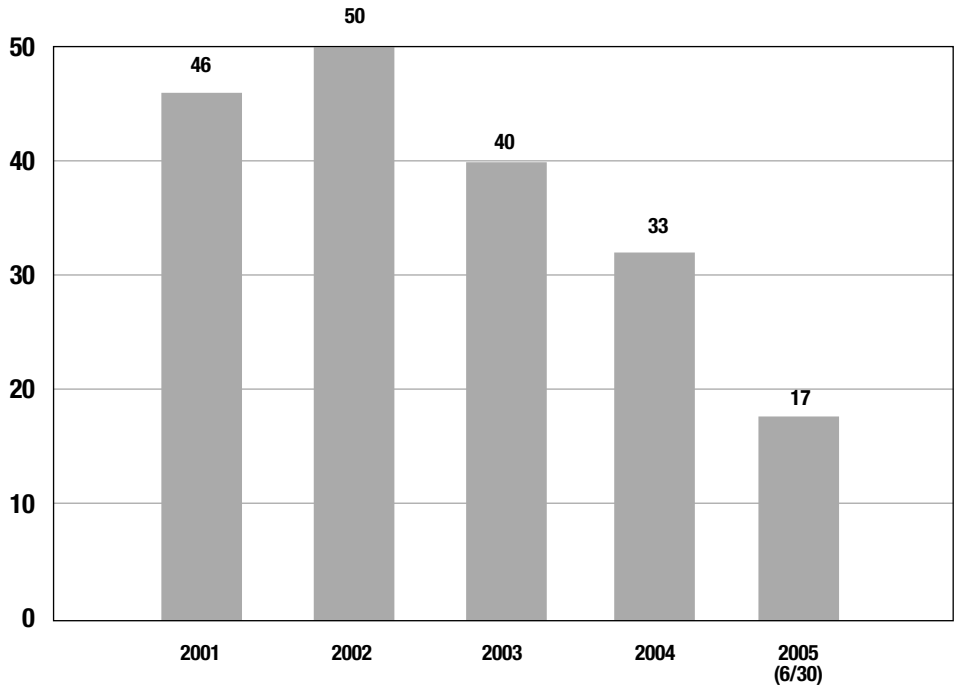
Figure 4—Memorandums of understanding



Source: OCC Systems. Note that totals for previous years' completed enforcement actions may be adjusted to reflect revised aggregates.

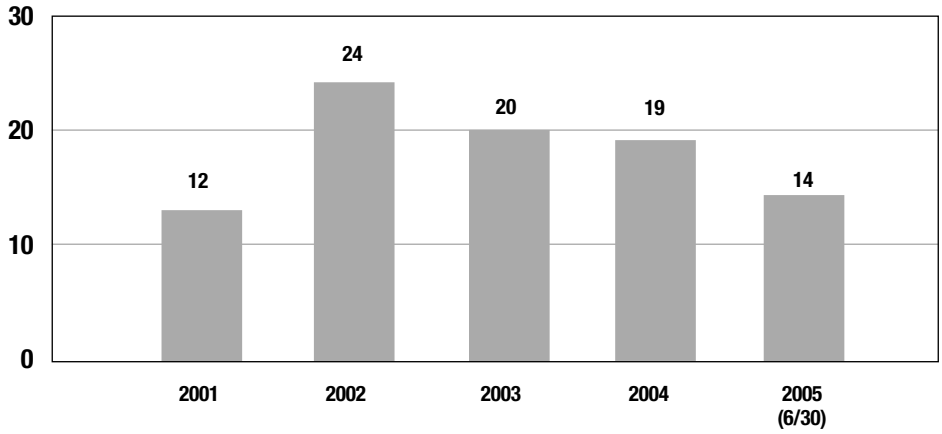
The most common types of formal enforcement actions issued by the OCC against banks over the past several years have been formal agreements and cease-and-desist orders. Formal agreements are documents signed by a national bank's board of directors and the OCC in which specific corrective and remedial measures are enumerated as necessary to return the bank to a safe and sound condition. Cease-and-desist orders (C&Ds), sometimes issued as consent orders, are similar in content to formal agreements, but may be enforced either through assessment of civil money penalties (CMPs) or by an action for injunctive relief in federal district court. The OCC may also assess CMPs against banks, and in 2005, the OCC assessed CMPs against 10 banks.

Figure 5—Formal agreements



Source: OCC Systems. Note that totals for previous years' completed enforcement actions may be adjusted to reflect revised aggregates.

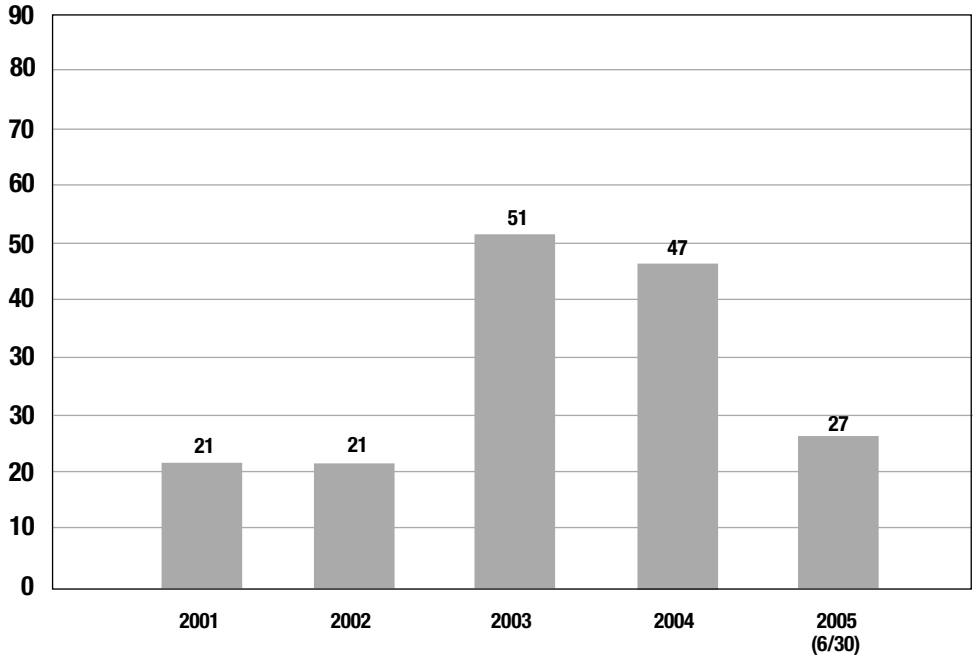
Figure 6—Cease-and-desist orders against banks



Source: OCC Systems. Note that totals for previous years' completed enforcement actions may be adjusted to reflect revised aggregates.

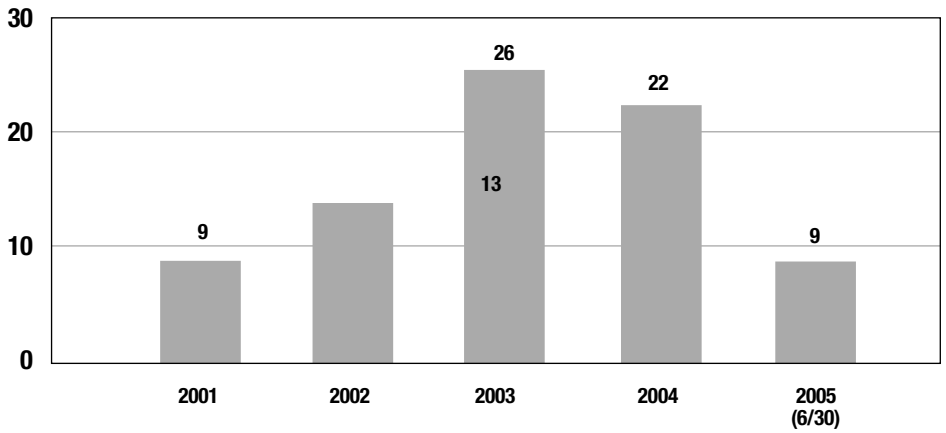
The most common enforcement actions against individuals and other institution-affiliated parties are CMPs, personal C&Ds, and removal and prohibition orders. CMPs are authorized for violations of laws, rules, regulations, formal written agreements, final orders, conditions imposed in writing, unsafe or unsound banking practices, and breaches of fiduciary duty. Personal C&Ds may be used to restrict activities, order payment of restitution, or require institution-affiliated parties to take other affirmative action to correct the results of past conduct. Removal and prohibition actions, which are used in the most serious cases, result in lifetime bans from the banking industry.

Figure 7—Civil money penalties against institution-affiliated parties



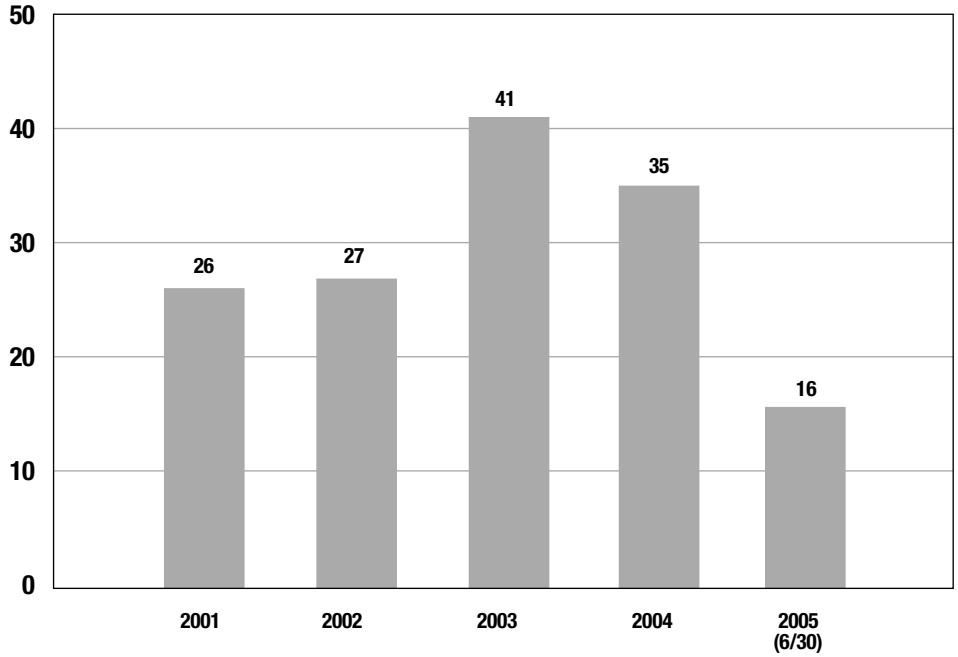
Source: OCC Systems. Note that totals for previous years' completed enforcement actions may be adjusted to reflect revised aggregates.

Figure 8—Cease-and-desist orders against institution-affiliated parties



Source: OCC Systems. Note that totals for previous years' completed enforcement actions may be adjusted to reflect revised aggregates.

Figure 9—Removal and prohibition orders



Source: OCC Systems. Note that totals for previous years' completed enforcement actions may be adjusted to reflect revised aggregates.

Recent Enforcement Cases

Below are summaries of the significant cases completed between January 1 and June 30, 2005:

A. Actions Involving Anti-Money Laundering/Bank Secrecy Act Compliance

Banks ordered to comply with BSA/AML provisions. The OCC brought enforcement actions against banks for failing to maintain adequate BSA/AML compliance programs and ordered those banks to provide for internal controls, auditing, and employee training and to designate a BSA compliance officer. *In the Matter of Asian Pacific National Bank, San Gabriel, Calif.,* Doc. No. 2005-3 (Jan. 24, 2005); *In the Matter of Arab Bank PLC, New York, N.Y. (federal branch),* Doc. Nos. 2005-13 (Feb. 8, 2005) and 2005-14 (Feb. 24, 2005); *In the Matter of City National Bank, Beverly Hills, Calif.,* Doc. No. 2005-16 (Feb. 23, 2005); *United Americas Bank, N.A., Atlanta, Ga.,* Doc. No. 2005-19 (Feb. 23, 2005); *The Fulton County National Bank and Trust Company, McConnellsburg, Penn.,* Doc. No. 2005-29 (Mar. 23, 2005); *Interbusiness Bank, N.A., Diamond Bar, Calif.,* Doc. No. 2005-53 (May 16, 2005); *Far East National Bank, Los Angeles, Calif.,* Doc. No. 2205-63 (June 13, 2005); *United National Bank, San Marino, Calif.,* Doc. No. 2005-64 (June 16, 2005); and *Continental National Bank of Miami, Miami, Fla.,* Doc. No. 2005-65 (June 22, 2005).

Order issued against bank and bank officer prohibited and ordered to pay fine. The OCC issued a cease-and-desist order by consent against the federal branch of Banco de Chile for deficiencies in the branch's internal controls, particularly in the area of BSA/AML compliance. The OCC also issued a prohibition order by consent and assessed a $200,000 civil money penalty against the branch's former general manager. *In the Matter of Banco de Chile, New York, N.Y. (federal branch),* Doc. No. 2005-2 (Feb. 1, 2005); *In the Matter of Hernan Donoso,* Doc. No. 2005-42 (Apr. 14, 2005).

B. Unfair and Deceptive Acts or Practices

Banks given guidance on unfair real estate lending practices. On Feb. 2, 2005, the OCC issued residential real estate lending standards and, on May 16, 2005, issued (jointly with other financial regulators) Credit Risk Management Guidance for Home Equity Lending, to assist national banks in their efforts to avoid becoming involved in predatory, abusive, unfair, or deceptive residential mortgage lending practices. (OCC Bulletin 2005-3, News Release 2005-48)

Former bank officer fined for real estate-secured lending practices. The OCC issued prohibition and cease-and-desist orders by consent and assessed a $20,000 civil money penalty against a former bank vice president and loan officer for making tax lien loans that violated the Home Ownership Equity Protection Act, the Truth in Lending Act, the Real Estate Settlement Procedures Act, and the Federal Trade Commission Act and for receiving a large portion of excessive and duplicative fees collected by the bank from customers, including fees for services that were never performed. The OCC had earlier required the bank to make restitution to affected customers and

had issued a cease-and-desist order by consent against the company that marketed, originated, serviced, and collected the tax lien loans to restrict its conduct of business with insured depository institutions. *In the Matter of Michael K. Muckleroy,* Doc. No. 2005-46 (Apr. 19, 2005).

C. Actions to Combat Identity Theft

Former bank teller prohibited and ordered to make restitution. The OCC issued prohibition and restitution orders by consent against a former bank teller for allegedly making unauthorized and fraudulent withdrawals from a bank customer's account, for his own benefit. *In the Matter of Bradley A. Odom, Bank of America, N.A., Charlotte, N.C.,* Doc. No. 2005-50 (Apr. 28, 2005).

Former bank employee prohibited and ordered to make restitution. Following the OCC's issuance of a Notice of Charges, the Federal Reserve Board issued a prohibition order and the OCC issued a restitution order against a former bank employee for allegedly altering bank records to inflate the amount of deposits into customers' accounts and depositing the surplus into his own account and for diverting for his own use a cash overage that resulted when he conducted an improper transaction. *In the Matter of Kenneth L. Coleman, PNC Bank, N.A., Pittsburgh, Pa., and Mellon Bank, N.A., Pittsburgh, Pa.,* Doc. No. 2005-37 (Mar. 1, 2005); *In the Matter of Kenneth L. Coleman,* Doc. No. 2005-38 (Mar. 2, 2005).

Former bank employee prohibited and ordered to pay fine. The OCC issued a prohibition order by consent and assessed a $5,000 civil money penalty against a former bank employee who allegedly made unauthorized transfers from her relatives' accounts into her business account; made unauthorized loans to, and withdrawals from, accounts of unrelated bank customers; and provided falsified bank documents to another bank for the purpose of obtaining a business loan. *In the Matter of Angie Cox, The Peoples National Bank of McLeansboro, McLeansboro, Ill.,* Doc. No. 2005-20 (Feb. 9, 2005).

Bank operating subsidiary ordered to pay fine. The OCC assessed a $180,000 civil money penalty by consent against a bank's operating subsidiary for allegedly failing to dispose of confidential customer information in a secure fashion, in violation of OCC regulations governing the security of customer information. *In the Matter of First Horizon Home Loan Corporation (operating subsidiary of First Tennessee Bank N.A., Memphis, Tenn.),* Doc. No. 2005-78 (June 30, 2005).

D. Actions to Enforce Flood Insurance Requirements

In the first half of 2005, the OCC assessed civil money penalties totaling $650,700 against 8 banks for violations of flood insurance requirements.

Banks ordered to pay fines for flood insurance violations. The OCC assessed civil money penalties of $500,000 and $115,000, respectively, against two banks for allegedly engaging in patterns of making loans in special flood hazard areas without requiring coverage of the property securing the loans by requisite flood insurance. The first bank also allegedly failed to provide required

notice to borrowers of insufficient flood insurance, and failed to purchase flood insurance on borrowers' behalf where required. I*n the Matter of Charter One Bank, N.A., Cleveland, Ohio,* Doc. No. 2005-55 (May 17, 2005); *In the Matter of Wells Fargo Bank, N.A., Sioux Falls, S.D.,* Doc. No. 2005-77 (June 27, 2005).

E. Actions to Combat Insider Abuse

Actions against bank officers and directors for violations of law, unsafe or unsound practices, and breaches of fiduciary duty. The OCC issued prohibition and restitution ($50,000) orders by consent and assessed a $20,000 civil money penalty against the former president of a bank. The Federal Reserve issued a prohibition order against the bank's former vice president and director on an action initiated by the OCC, which also assessed a $50,000 civil money penalty. The bank, which had been operating under a formal agreement since 2001, allegedly failed to correct deficiencies in lending practices, asset quality, and internal controls and allegedly failed to correct violations of law, including suspected violations of the legal lending limit. The bank's four outside directors consented to assessments of civil money penalties in amounts ranging from $5,000 to $18,000. Three of those directors consented to cease-and-desist orders and the fourth consented to a prohibition order. *In the Matter of Robert C. Hobgood, First National Bank, Lubbock, Tex.,* Doc. No. 2005-33 (Feb. 18, 2005); *In the Matter of Walter C. "Charlie" Cleveland,* Doc. Nos. 2005-79 (June 20, 2005) and 2005-121 (Aug. 17, 2005); *In the Matter of Kim Morris,* Doc. No. 2004-111 (Sept. 3, 2004); *In the Matter of Darrell Hobgood,* Doc. No. 2004-110 (Sept. 28, 2004); *In the Matter of Brian Burns,* Doc. No. 2004-125 (Oct. 13, 2004); *In the Matter of Johnny Bob Carruth,* Doc. No. 2004-109 (Sept. 22, 2004).

Joint action by OCC and HUD against banks' settlement agent. The OCC issued a cease-and-desist order by consent and, jointly with the Dept. of Housing and Urban Development, assessed a $5 million civil money penalty against a title insurance company for an alleged pattern of violation of the Real Estate Settlement Procedures Act by providing inaccurate HUD-1 Settlement Statements to borrowers and to federally insured depository institutions and for unsafe or unsound settlement practices. Two loan officers, one of whom is suspected to have engaged in misconduct at two successive banks, allegedly received payments and other benefit for making several million dollars' worth of loans to non-creditworthy borrowers for the benefit of a third party and to the detriment of the banks issuing the loans. The OCC issued prohibition actions by consent and assessed civil money penalties of $250,000 and $130,000 against those two former bank officers for misconduct in connection with the origination of loans. *In the Matter of Chicago Title Insurance Co., settlement agent for Whitney National Bank, New Orleans, La.; Southwest Bank of Texas, N.A., Houston, Tex., and Frost National Bank, San Antonio, Tex.,* Doc. No. 2005-12 (Feb. 24, 2005); *In the Matter of Tom J. Trammell, Southwest Bank of Texas, N.A., and Whitney National Bank,* Doc. No. 2005-11 (Feb. 4, 2005); *In the Matter of David A. Ranostaj, Whitney National Bank,* Doc. No. 2004-152 (Dec. 23, 2004).

Action against bank for insider abuse. The OCC issued a cease-and-desist order against a community bank for alleged insider abuse and for failure to comply with a 2002 Formal Agreement. *In the Matter of First National Bank of Shelby County, Columbiana, Ala.,* Doc. No. 2005-52 (May 18, 2005).

Petitions for review of enforcement actions rejected by Ninth Circuit Court of Appeals. In 2003, following the OCC's issuance of Notices of Charges, the Federal Reserve Board issued orders for prohibition against two former bank insiders, and the OCC issued an order for joint payment of $232,000 in restitution and assessed civil money penalties of $35,000 and $20,000. In April 2005, a panel of the Ninth Circuit Court of Appeals rejected the insiders' petitions for review of the earlier orders. *In the Matter of Gene Ulrich and Susan Diehl McCarthy, Six Rivers National Bank, Eureka, Calif.,* 9th Cir. Ct. Docket Nos. 03-73491, 03-73591, 03-73854, 03-73997 (Apr. 27, 2005); *In the Matter of Gene Ulrich and Susan Diehl McCarthy,* Doc. Nos. 2003-169 (Sept. 2, 2003) and 2003-170 (Oct. 15, 2003).

Former bank officer prohibited and ordered to pay fine. The OCC issued a prohibition order by consent and assessed a $2,500 civil money penalty against a former bank senior vice president for a pattern of misconduct involving unsafe or unsound lending practices and extending credit in violation of the bank's legal lending limits. *In the Matter of Daniel R. Kline, The National Union Bank of Kinderhook, Kinderhook, N.Y.,* Doc. No. 2005-30 (Mar. 28, 2005).

F. Early Intervention for Problem Banks

Former bank president ordered to pay fine and take remedial action. The OCC issued a cease-and-desist order by consent and assessed a $35,000 civil money penalty against the former president of a bank that had allegedly engaged in a questionable loan transaction with The Central Bank of the Gambia. Seven of the bank's directors previously had consented to the OCC's assessments of civil money penalties for varying levels of alleged culpability for the loan transaction and other deficiencies in the bank's operations. In the Matter of Richard Dean, First Liberty National Bank, Washington, D.C., Doc. Nos. 2005-41 and 2005-48 (Apr. 13, 2005); *In the Matter of Arthur Mason,* Doc. No. 2004-104; *In the Matter of Madhu Mohan,* Doc. No. 2004-105; *In the Matter of Patrick M. Donahue,* Doc. No. 2004-99; *In the Matter of John J. Mahoney,* Doc. No. 2004-103; *In the Matter of Shailendra Kumar,* Doc. No. 2004-102; *In the Matter of Kailash C. Goel,* Doc. No. 2004-100; *In the Matter of John M. Jacquemin,* Doc. No. 2004-101 (Sept. 22, 2004).

Actions against bank's chairman of the board and directors. The OCC issued a cease-and-desist order by consent and assessed a $27,500 civil money penalty against a bank's former chairman of the board for allegedly engaging in unsafe or unsound practices or breaches of fiduciary duty by (a) his continued unreasonable disregard of examination findings and direction of the OCC and (b) repeatedly failing to ensure that bank management for which he was responsible took steps to accurately report the bank's condition, as required by 12 USC 161. In addition, he allegedly

engaged in unsafe and unsound practices or breaches of fiduciary duty while acting as the bank's outside counsel by failing to obtain approval of the bank's board of directors and failing to apprise the OCC of his law firm's stipulation to an injunction against the bank in a suit against the bank, which stipulation consented to an encumbrance of all of the bank's assets. The OCC also assessed civil money penalties ranging from $10,000 to $15,000 against five bank directors for alleged disregard of regulatory direction and inaccurate regulatory reports. *In the Matter of David A. Barrett, Guaranty National Bank of Tallahassee, Tallahassee, Fla.,* Doc. No. 2005-66 (June 24, 2005); *In the Matter of Linda Alexionok,* Doc. No. 2005-54 (May 17, 2005); *In the Matter of Rica Barrett,* Doc. No. 2005-67 (June 14, 2005); *In the Matter of Kenneth Fuqua,* Doc. No. 2005-68 (June 24, 2005); *In the Matter of Wilma Lauder,* Doc. No. 2005-69 (June 8, 2005).

G. Fast Track Enforcement Cases

The OCC continued its Fast Track Enforcement program, initiated in 1996, which ensures that bank insiders who have engaged in criminal acts in banks but who are not being criminally prosecuted are prohibited from working in the banking industry. As part of the Fast Track Enforcement program, the OCC secured 5 consent prohibition orders against institution-affiliated parties from January 1, 2005, through May 25, 2005. Four of these orders incorporated restitution to the appropriate bank for losses incurred, and one of the orders incorporated a civil money penalty. During the same period, the OCC sent out notifications to 220 former bank employees who were convicted of crimes of dishonesty; the letters informed them that under federal law they are prohibited from working again in any federally insured depository institution.

Appeals Process

Appeals Process

Appeal 1—Appeal of Semiannual Assessment Fee

Background

A bank formally appealed the OCC's right to retain the full semiannual assessment fee for the period of January 1 through June 30 since the bank converted to a state chartered commercial bank on January 1.

Discussion

The bank requested a full refund of its semiannual assessment because the supervisory responsibility shifted from the OCC to the state on January 1 and therefore no supervisory activities would be conducted by the OCC during the period covered by the assessment.

The ombudsman reviewed OCC regulations regarding payment of semiannual assessment fees. According to paragraph (5) under section (a) of 12 CFR 8 Assessment of Fees, "Each bank subject to the jurisdiction of the Comptroller of the Currency on the date of the second or fourth quarterly Call Report required by the OCC under 12 USC 161 is subject to the full assessment for the next six-month period." The OCC assessment is levied against all institutions that are in the national banking system as of December 31st and June 30th. Therefore, any bank that is a national bank on the assessment date is required to pay the full semiannual assessment for the upcoming six-month period.

Conclusion

After careful review of OCC regulations, and finding no basis for an exception, the ombudsman determined that no refund was due to the bank.

Appeal 2—Appeal of Composite and Component Ratings

Background

The bank's board of directors appealed the downgrade to a 3 of its overall composite rating and the component ratings for asset quality, management, and consumer compliance. Additionally,

the board appealed the violations of law of the legal lending limit. The bank was placed under a formal agreement prior to filing the appeal.

Discussion

The appeal states that the report of examination (ROE) contains unfounded allegations regarding the bank's relationship with a third-party subprime mortgage vendor, which resulted in unsatisfactory ratings in asset quality, management, and consumer compliance. Furthermore, the board stated that the legal lending limit violations were based on the manner in which the lending program operated as opposed to the written agreements between the subprime mortgage vendor and the bank.

According to the appeal, even when considering the subprime nature of the mortgage loan portfolio, the bank had not experienced losses as a result of its relationship with the subprime mortgage vendor. Bank management stated that the supervisory office was advised of the bank's interest in purchasing participations from the subprime mortgage vendor and raised no objections. Management questioned the OCC's decision to pursue an administrative action, including civil money penalties, after the bank decided to wind down its participation with the subprime mortgage vendor. The appeal also stated that the component ratings that were downgraded in this examination had been assigned satisfactory ratings only four months prior. Finally, the appeal states that the bank has not done anything wrong, much less illegal, predatory or abusive, in its relationship with the subprime mortgage vendor.

The supervisory office stated that bank management failed to provide adequate oversight of its relationship with the subprime mortgage vendor. The lack of policies and procedures for the subprime mortgage portfolio, poor loan administration and risk management practices coupled with the predatory nature of the portfolio, exposed the bank to increased reputation and financial risk. Loan officers responsible for the subprime mortgage portfolio lacked the knowledge necessary to identify violations of law and regulation in the portfolio. This indicated a lack of proper training over consumer laws and regulations along with weak internal controls. Based on the weaknesses noted in the areas of credit, risk management, and consumer compliance, including the resulting violations of law, management and board supervision were considered weak.

Conclusion

The ombudsman conducted a review of the information submitted by the bank and support documentation from the supervisory office. The review included meetings with the bank's senior management and legal counsel, as well as with members of the supervisory office.

Because the bank was operating under an enforcement action, the ombudsman's review was limited to a determination of reasonableness as defined in OCC Bulletin 2002-9, "National Bank Appeals Process," (February 25, 2002). Essentially, the ombudsman used a process similar to that of a federal appeals judge versus the de-novo review process that is customarily employed on

non-enforcement-related appellate matters. Therefore, the review focused on whether the ratings were reasonable as assigned based on the condition of the bank at the time of the examination. Additionally, the violations of law were deemed to be outside of the scope of the appeal.

The ombudsman ruled that the conclusions reached by the supervisory office regarding asset quality, management, and consumer compliance were reasonable and well supported by the facts at the time of the examination. Additionally, the overall condition of the bank met the criteria of a composite-3-rated bank as prescribed by the Uniform Financial Institutions Rating System (UFIRS), (OCC Bulletin 97-1, "Uniform Financial Institutions Rating System and Disclosure of Component Ratings," January 3, 1997).

Appeal 3—Appeal of the Composite and Certain Component Ratings

Background

A bank, operating under a formal agreement, appealed the composite and component ratings for capital, asset quality, management, earnings, and liquidity assigned at the most recent examination.

Discussion

The bank's board of directors appealed the conclusions noted in the most recent safety and soundness examination that resulted in the downgrade of the bank's composite rating from 2 to 4. According to the appeal, the primary cause of the criticisms noted in the report of examination (ROE) can be traced to a former senior loan officer and were not reflective of overall bank supervision. The appeal further states that the downgrades for capital, asset quality, management, earnings, and liquidity were primarily based upon the perception that classified assets were increasing, and this increase would cause net losses and liquidity issues. Since the examination, the board believes that management has improved asset quality problems, created an adequate allowance for loan and lease losses, collected a significant amount of classified assets, and implemented proper policies and procedures in the lending area. Consequently, the perceived negative impact on capital, earnings, and liquidity did not materialize. Therefore, the board believes the composite, capital, asset quality, management, and earnings ratings each merit a 3 and liquidity should be rated 2.

The supervisory office response notes that the appeal discusses actions taken by the board post-examination but does not refute findings noted during the examination. As such, conclusions cited in the ROE are a valid representation of the bank's condition at that time. Asset quality was deemed unacceptable and credit risks were high. The board had failed to implement adequate procedures to prevent insider abuse and to implement an effective risk management system. Earnings performance was poor; loan losses and increased provision expenses led to net losses for the year

and the current quarter. These factors as well as an increasing overall risk profile had an impact on capital adequacy. The diminishing level of secondary funding sources also affected liquidity. The supervisory office restated its position that the assigned composite of 4 and component ratings of 4, 4, 4, 4, and 3 for capital, asset quality, management, earnings, and liquidity, respectively, met the criteria in the Uniform Financial Institutions Ratings System (UFIRS).

Conclusion

The ombudsman reviewed the bank's submission as well as information supplied by the supervisory office. Because the bank was operating under an enforcement action, the ombudsman's review was limited to a determination of reasonableness as defined in OCC Bulletin 2002-9, "National Bank Appeals Process." Essentially, the ombudsman used a process similar to that of a federal appeals judge versus the de-novo review process that is customarily employed on non-enforcement-related appellate matters. Therefore, the review focused on whether the ratings were reasonable as assigned based on the condition of the bank at the time of the examination.

The ombudsman opined that the conclusions reached by the supervisory office were reasonable, well supported by the facts at the time of the examination, and met the definition of a composite 4 bank as prescribed by UFIRS. The ombudsman also found that the assigned component ratings for capital, asset quality, management, earnings, and liquidity were reasonable and accurately reflected the bank's condition at the time of the examination.

Speeches and Congressional Testimony

Speeches and Congressional Testimony

4/26/2005, Acting Comptroller of the Currency Julie L. Williams Testifies before Senate Committee on Implementation of Bank Secrecy Act in the Context of Money Services Businesses [Testimony]

5/3/2005, Acting Comptroller Julie L. Williams Cites Foreclosures as Most Immediate Community Development Challenge; Stresses Need for Multi-Dimensional Mortgage Delinquency Interventions Programs [Speech]

5/6/2005, Acting Comptroller Julie L. Williams Discusses Management and Supervision of Reputation Risk in Large Banking Organizations; Stresses Important Role of Ethics and Corporate Values [Speech]

5/11/2005, Acting Comptroller Julie L. Williams Testifies before House Subcommittees on Basel II Framework Issues [Testimony]

5/12/2005, Acting Comptroller Julie L. Williams Tells Bankers Disclosures not Working for Consumers and Imposing Unnecessary Burdens, Calls for Re-Examination of Process of Developing Consumer Disclosures for Financial Products and Services [Speech]

5/17/2005, Acting Comptroller of the Currency Julie L. Williams Tells Senate Banking Committee Credit Card Disclosures Can be Improved, Urges New Approach to Consumer Disclosures for Financial Products and Services [Testimony]

5/27/2005, Acting Comptroller Julie L. Williams Tells Community Bankers OCC Working Hard to Make Regulation More Efficient and Less Burdensome [Speech]

6/09/2005, Acting Comptroller Julie L. Williams Urges Steps to Reduce Unnecessary Regulatory Burden and Improve Consumer Disclosure [Testimony]

6/21/2005, Acting Comptroller Julie L. Williams Supports Regulatory Burden Relief Legislation; Urges New Approach to Consumer Disclosure Requirements to Reduce Regulatory Burden and Deliver Information that Consumers Understand [Testimony]

Interpretations

Interpretations

April [Interpretations and Actions]

1020, 2/8/2005, Letter concludes that national bank directors may meet the qualifying shares requirement under 12 USC 72 by purchasing trust preferred stock. [Note: Reprinted because of date error]

1024, 3/21/2005, Letter concludes that a national bank that renews a loan to an insider violates section 215.4(a)(1) of Regulation O and section 22(h)(A) of the Federal Reserve Act if the loan either (i) is preferential or (ii) involves more than the normal risk of repayment or presents other unfavorable features.

1025, 4/6/2005, Letter concludes that it is permissible for a national bank to engage in customer-driven electricity derivative transaction and hedges, settled in cash and by transitory title transfer, as activities part of, or incidental to, bank permissible financial intermediation transactions.

May [Interpretations and Actions]

1026, 4/27/2005, Letter concludes that the bank's proposed securities conduit lending services are legally permissible for a national bank.

1027, 5/3/2005, Letter confirms that the bank may purchase and hold the preferred securities of two special purpose entities that hold interests in Australian mortgage assets.

1028, 5/9/2005, Letter concludes that the OCC would not find a violation of 12 CFR 37.3(a) in connection with a national bank's automobile loan that includes a GAP feature offered by the bank because the OCC views the underlying loan and the GAP feature as a single product, and the financial arrangement does not create a separate product.

June [Interpretations and Actions]

1029, 5/23/2005, Letter grants a request for a waiver of certain provisions of the OCC's securities confirmation rules at 12 CFR Part 12 in connection with the bank's transfer agent activities for various dividend reinvestment, stock purchase, and employee stock purchase plans.

1030, 5/26/2005, Letter concludes that national bank may continue to hold a separate account bank-owned life insurance investment that in turns holds interests in instruments with characteristics of debt securities and a rate of return, a portion of which is linked to equity securities, provided the bank's examiner-in-charge has no supervisory objection.

1031, 1/19/1995, Letter concludes that a bank may create a trust to purchase and hold investments beyond those allowed for national banks without violating 12 USC 24(Seventh) and 12 CFR Part 1.

1032, 6/16/2005, Letter concludes that "GAP Addendums" sold by a national bank to borrowers in connection with the bank's motor vehicle loans, in connection with a GAP program administered by an insurance company, are debt cancellation contracts subject to 12 CFR Part 37.

Mergers

Mergers—April 1 to June 30, 2005

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Mergers—April 1 to June 30, 2005

Most transactions in this section do not have accompanying decisions. In those cases, the OCC reviewed the competitive effects of the proposals by using its standard procedures for determining whether the transaction has minimal or no adverse competitive effects. The OCC found the proposals satisfied its criteria for transactions that clearly had no or minimal adverse competitive effects. In addition, the Attorney General either filed no report on the proposed transaction or found that the proposal would not have a significantly adverse effect on competition.

Nonaffiliated mergers (mergers consummated involving two or more nonaffiliated operating banks), from April 1 to June 30, 2005

Title and location (charter number)	Total assets
Florida	
Commercebank, National Association, Coral Gables (016804)	3,534,385,000
and First Texoma Bank, Houston, Texas	5,000,000
merged on April 22, 2005, under the title of **Commercebank, National Association, Coral Gables** (016804)	3,534,385,000
Indiana	
Horizon Bank, National Association, Michigan City (002747)	913,831,000
and Alliance Banking Company, New Buffalo, Michigan	129,971,000
merged on June 10, 2005, under the title of **Horizon Bank, National Association, Michigan City** (002747)	1,043,186,000
Kansas	
Sunflower Bank, National Association, Salina (004742)	1,081,047,000
and First National Bank-Colorado, Fowler, Colorado (007637)	67,061,000
merged on April 7, 2005, under the title of **Sunflower Bank, National Association, Salina** (004742)	1,148,108,000
Louisiana	
Whitney National Bank, New Orleans (014977)	8,064,053,000
and Destin Bank, Destin, Florida	470,275,000
merged on April 22, 2005, under the title of **Whitney National Bank, New Orleans** (014977)	8,064,053,000
New Jersey	
Valley National Bank, Passaic (015790)	11,370,247,000
and NorCrown Bank, Livingston, New Jersey	632,176,000
merged on June 3, 2005, under the title of Valley National Bank, Passaic (015790)	12,103,796,000
Union Center National Bank, Union (012425)	930,665,000
and Red Oak Bank, Hanover Township, New Jersey	95,628,000
merged on May 20, 2005, under the title of **Union Center National Bank, Union** (012425)	1,041,454,000
South Carolina	
South Carolina Bank and Trust, National Association, Orangeburg (013918)	1,222,000
and New Commerce Bank, National Association, Greenville, South Carolina (023818)	94,000
merged on April 8, 2005, under the title of **South Carolina Bank and Trust, National Association, Orangeburg** (013918)	1,309,000
West Virginia	
City National Bank of West Virginia, Charleston (014807)	2,208,983,000
and Classic Bank, Ashland, Kentucky	344,745,000
merged on May 20, 2005, under the title of **City National Bank of West Virginia, Charleston** (014807)	2,562,587,000

Nonaffiliated merger—thrift (merger consummated involving nonaffiliated national banks and savings and loan associations), from April 1 to June 30, 2005

Title and location (charter number)	Total assets
New Jersey	
Marathon Interim Bank N.J., National Association, Fort Lee (024599)	25,000
and Ocwen Federal Bank, FSB, Fort Lee, New Jersey	280,634,000
merged on June 30, 2005, under the title of **Marathon Interim Bank N.J., National Association, Fort Lee** (024599)	280,634,000

Affiliated mergers (mergers consummated involving two or more affiliated operating banks), from April 1 to June 30, 2005

Title and location (charter number)	Total assets
Arkansas	
First National Bank, Hot Springs (016952)	184,742,000
and First National Bank in Mena, Mena, Arkansas (013693)	116,694,000
and First National Bank, Hot Springs, Arkansas (024333)	74,384,000
merged on April 23, 2005, under the title of **First National Bank, Hot Springs** (024333)	375,820,000
California	
First National Bank of Northern California, Daly City (015089)	485,387,000
and Sequoia National Bank, San Francisco, California (021337)	65,561,000
merged on April 30, 2005, under the title of **First National Bank of Northern California, Daly City** (015089)	550,948,000
Regents Bank, National Association, San Diego (La Jolla) (024214)	168,559,000
and Regents Savings Bank, Vancouver,	
merged on April 18, 2005, under the title of **Regents Bank, National Association, San Diego (La Jolla)** (024214)	168,560,000
Delaware	
HSBC Bank USA, National Association, Wilmington (024522)	126,908,000,000
and Bank of Bermuda (New York) Limited, New York, New York 93	
merged on March 1, 2005, under the title of **HSBC Bank USA, National Association, Wilmington** (024522)	127,001,000,000
Illinois	
Harris Bank Glencoe-Northbrook National Association , Glencoe (014583)	526,236,000
and Harris Bank West, National Association , Roselle, Illinois (024567)	541,303,000
merged on May 27, 2005, under the title of **Harris Bank Glencoe-Northbrook, National Association, Glencoe** (014583)	1,067,539,000
Harris Bank Glencoe-Northbrook, National Association, Glencoe (014583)	1,067,539,000
and Harris Bank Huntley, Huntley, Illinois	125,461,000
and Harris Bank Libertyville, Libertyville, Illinois	385,804,000
and Harris Bank Marengo, Marengo, Illinois	93,844,000
and Harris Bank Naperville, Naperville, Illinois	821,944,000
and Harris Bank Oakbrook Terrace, Oakbrook Terrace, Illinois	142,113,000
and Harris Bank St. Charles, Saint Charles, Illinois	489,846,000
and Harris Bank Westchester, Westchester, Illinois	204,857,000
and Harris Bank Woodstock, Woodstock, Illinois	274,802,000
and Harris Trust and Savings Bank, Chicago, Illinois	20,157,943,000
and Harris Bank Barrington, National Association, Barrington, Illinois (011283)	1,307,399,000
and Harris Bank Aurora, National Association, Aurora, Illinois (014942)	191,150,000
and Harris Bank Batavia, National Association, Batavia, Illinois (004646)	198,613,000
and Harris Bank Elk Grove, National Association , Elk Grove Village, Illinois (015916)	170,201,000
and Harris Bank Hinsdale National Association, Hinsdale, Illinois (011308)	810,537,000
and Harris Bank Joliet, National Association, Joliet, Illinois (013705)	1,274,121,000
and Harris Bank Palatine, National Association, Palatine, Illinois (014494)	595,813,000
and Harris Bank Wilmette National Association, Wilmette, Illinois (016176)	154,423,000
and Harris Bank Winnetka National Association , Winnetka, Illinois (014365)	472,925,000
and Harris Bank Argo, Summit, Illinois	394,229,000
and Harris Bank Arlington-Meadows, Rolling Meadows, Illinois	324,925,000
and Suburban Bank of Barrington, Barrington, Illinois	281,205,000
and Harris Bank Bartlett, Bartlett, Illinois	222,367,000
and Harris Bank Cary-Grove, Cary, Illinois	206,994,000
and Harris Bank Frankfort, Frankfort, Illinois	305,559,000
and Harris Bank Hoffman-Schaumburg , Hoffman Estates, Illinois	112,430,000
merged on May 27, 2005, under the title of **Harris Bank Glencoe-Northbrook National Association, Glencoe** (014583)	30,242,141,000
Atlantic Trust, National Association , Chicago (024582)	
and Atlantic Trust Company (Atlantic), National Association, Washington, District of Columbia (022590)	14,023,000
and Atlantic Trust Company, National Association , Boston, Massachusetts (021452)	146,120,000
merged on April 30, 2005, under the title of **Atlantic Trust Company, National Association, Chicago** (024582)	160,143,000

Affiliated mergers (mergers consummated involving two or more affiliated operating banks), from April 1 to June 30, 2005 (continued)

Title and location (charter number)	Total assets
New Jersey	
Commerce Bank, National Association , Cherry Hill (017094)	21,468,096,000
and Commerce Bank/Delaware, National Association , Wilmington, Delaware (023558)	381,363,000
merged on May 1, 2005, under the title of **Commerce Bank, National Association, Cherry Hill** (017094)	21,849,459,000
New York	
Marathon National Bank of New York, Astoria, Fort Lee, New Jersey (021686)	687,375,000
and Marathon Interim Bank N.J., National Association (024599)	280,634,000
merged on June 30, 2005, under the title of **Marathon National Bank of New York, Astoria** (021686)	968,009,000
North Carolina	
Bank of America, National Association, Charlotte (013044)	690,572,545,000
and Fleet National Bank, Providence, Rhode Island (000200)	195,323,000,000
June 13, 2005, under the title of **Bank of America, National Association, Charlotte** (013044)	913,692,028,000
Ohio	
Bank One, National Association, Columbus (007621)	38,768,134,000
and First Chicago NBD Mortgage Company, Troy, Michigan	2,540,420,000
and Bank One Mortgage Corporation, Indianapolis,	
merged on September 1, 2001, under the title of **Bank One, National Association, Columbus** (007621)	41,205,320,000
Bank One, National Association , Columbus (007621)	51,757,952,000
and Banc One Services Corporation, Columbus, Ohio 351,897	
merged on October 1, 2002, under the title of **Bank One, National Association, Columbus** (007621)	52,109,849,000
U.S. Bank National Association, Cincinnati (000024)	192,453,403,000
and U.S. Bank Trust Interim National Association, Connecticut, Hartford, Connecticut (024590)	49,011,000
merged on May 2, 2005, under the title of **U.S. Bank National Association, Cincinnati** (000024)	192,455,639,000
Pennsylvania	
PNC Bank, National Association , Pittsburgh (001316)	73,809,168,000
and Riggs National Trust Company, McLean, Virginia (024597)	6,196,000,000
merged on May 13, 2005, under the title of **PNC Bank, National Association, Pittsburgh** (001316)	80,005,000,000
Rhode Island	
Fleet National Bank, Providence (000200)	209,561,316,000
and Fleet Maine, National Association , South Portland, Maine (022818)	48,375,000
merged on March 18, 2005, under the title of **Fleet National Bank, Providence** (000200)	209,566,691,000
Tennessee	
National Bank of Commerce, Memphis (013681)	23,936,766,000
and NBC Interim Bank, National Association, Memphis, Tennessee (024594)	26,666,000
merged on April 22, 2005, under the title of **National Bank of Commerce, Memphis** (013681)	23,967,423,000

Affiliated merger—thrift (merger consummated involving affiliated national banks and savings and loan associations), from April 1 through June 30, 2005

Title and location (charter number)	Total assets
Alabama	
Colonial Bank, National Association, Montgomery (024444)	18,884,741,000
and First Federal Savings Bank of Lake County, Leesburg, Florida	1,065,217,000
merged on June 2, 2005, under the title of **Colonial Bank, National Association, Montgomery** (024444)	18,884,741,000

Corporate Structure of the National Banking System

Corporate Structure of the National Banking System

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Changes in the corporate structure of the national banking system, by state, January 1 to June 30, 2005

	In operation January 1, 2005	Organized and open for business	Merged	Voluntary liquidations	Payouts	12 USC 214		In operation June 30, 2005
						Converted to non-national institutions	Merged with non-national institutions	
Alabama	23	0	0	0	0	0	1	22
Alaska	4	0	0	0	0	0	0	4
Arizona	14	2	0	0	0	1	0	15
Arkansas	44	1	4	0	0	0	0	41
California	81	5	2	0	0	1	2	81
Colorado	47	1	1	0	0	1	2	44
Connecticut	11	1	1	0	0	0	0	11
Delaware	15	0	1	0	0	0	0	14
District of Columbia	5	0	1	0	0	0	0	4
Florida	71	0	0	0	0	1	5	65
Georgia	55	0	0	0	0	0	2	53
Hawaii	1	0	0	0	0	0	0	1
Idaho	2	0	0	0	0	0	0	2
Illinois	165	3	10	0	0	2	3	153
Indiana	36	0	1	0	0	0	0	35
Iowa	48	0	1	0	0	0	0	47
Kansas	94	0	0	0	0	0	1	93
Kentucky	43	0	0	0	0	0	0	43
Louisiana	15	0	0	0	0	0	0	15
Maine	6	0	2	0	0	0	0	4
Maryland	10	0	0	0	0	0	0	10
Massachusetts	20	0	1	1	0	0	0	18
Michigan	24	0	0	0	0	0	0	24
Minnesota	115	1	0	0	0	0	5	111
Mississippi	19	1	1	0	0	0	0	19
Missouri	47	0	0	0	0	0	1	46
Montana	14	0	0	0	0	0	0	14
Nebraska	67	0	0	0	0	0	0	67
Nevada	7	0	0	0	0	0	0	7
New Hampshire	4	0	0	0	0	0	0	4
New Jersey	23	0	0	0	0	0	0	23
New Mexico	14	0	0	0	0	0	0	14
New York	58	2	0	0	0	0	0	60
North Carolina	5	0	0	0	0	0	0	5
North Dakota	12	0	0	0	0	0	0	12
Ohio	82	3	2	0	0	0	1	8
Oklahoma	84	0	0	0	0	1	0	83
Oregon	4	0	0	0	0	0	0	4
Pennsylvania	78	1	0	0	0	2	0	77
Rhode Island	5	1	2	0	0	0	0	4
South Carolina	25	1	1	0	0	0	1	24
South Dakota	19	0	0	0	0	1	0	18
Tennessee	28	2	1	0	0	0	1	28
Texas	318	1	2	0	0	5	2	310
Utah	7	0	0	0	0	0	0	7
Vermont	8	0	0	0	0	0	0	8
Virginia	39	3	1	1	0	0	1	39

Changes in the corporate structure of the national banking system, by state, January 1 to June 30, 2005 (continued)

	In operation January 1, 2005	Organized and open for business	Merged	Voluntary liquidations	Payouts	12 USC 214		In operation June 30, 2005
						Converted to non-national institutions	Merged with non-national institutions	
Washington	13	0	0	0	0	0	0	13
West Virginia	18	0	0	0	0	1	1	16
Wisconsin	43	0	0	0	0	1	1	41
Wyoming	15	0	0	0	0	0	0	15
Totals:	2,005	29	35	2	0	17	30	1,950

Notes: The column "organized and opened for business" includes all state banks converted to national banks as well as newly formed national banks. The column titled "merged" includes all mergers, consolidations, and purchases and assumptions of branches in which the resulting institution is a nationally chartered bank. Also included in this column are immediate FDIC-assisted "merger" transactions in which the resulting institution is a nationally chartered bank. The column titled "voluntary liquidations" includes only straight liquidations of national banks. No liquidation pursuant to a purchase and assumption transaction is included in this total. Liquidations resulting from purchases and assumptions are included in the "merged" column. The column titled "payouts" includes failed national banks in which the FDIC is named receiver and no other depository institution is named as successor. The column titled "merged with non-national institutions" includes all mergers, consolidations, and purchases and assumptions of branches in which the resulting institution is a non-national institution. Also included in this column are immediate FDIC-assisted "merger" transactions in which the resulting institution is a non-national institution.

Applications for new, full-service national bank charters, approved and denied, by state, January 1 to June 30, 2005

Title and location	Approved	Denied
Arkansas		
Legacy National Bank, Springdale	January 26, 2005	Commercial/consumer (full srvc bnk)
California		
National Bank, Westminstert	March 14, 2005	Commercial/consumer (full srvc bnk)
Connecticut		
U.S. Bank Trust Interim National Association, Connecticut, Hartford	March 21, 2005	Commercial/consumer (full srvc bnk)
South Carolina		
Independence National Bank, Greenville	January 27, 2005	Commercial/consumer (full srvc bnk)
Virginia		
Sonabank, National Association, Charlottesville	February 17, 2005	Commercial/consumer (full srvc bnk)

Applications for new, limited-purpose national bank charters, approved and denied, by state, January 1 to June 30, 2005

Title and location	Type of bank	Approved
Delaware		
HSBC Trust Company (Delaware), National Association, Wilmington	Trust (non-deposit)	May 3, 2005
Nevada		
Town North Bank Nevada, National Association, Las Vegas	Credit card	May 11, 2005
Rhode Island		
Bank of America Rhode Island, National Association, Providence	Banker's bank	March 24, 2005
Virginia		
Riggs National Trust Company, McLean	Trust (non-deposit)	March 28, 2005

New, full-service national bank charters issued, January 1 to June 30, 2005

Title and location	Charter number	Date
Arizona		
Western National Bank, Phoenix Commercial/consumer (full srvc bnk)	(024552)	February 2, 2005
Arkansas		
Legacy National Bank, Springdale Commercial/consumer (full srvc bnk)	(024573)	March 28, 2005
California		
First Heritage Bank, National Association, Newport Beach Commercial/consumer (full srvc bnk)	(024574)	February 15, 2005
Pacific Coast National Bank, San Clemente Commercial/consumer (full srvc bnk)	(024535)	May 16, 2005
Excel National Bank, Beverly Hills Commercial/consumer (full srvc bnk)	(024493)	February 1, 2005
Connecticut		
U.S. Bank Trust Interim National Association, Connecticut, Hartford Commercial/consumer (full srvc bnk)	(024590)	May 2, 2005
Illinois		
Harris Bank West, National Association, Roselle Commercial/consumer (full srvc bnk)	(024567)	May 27, 2005
Minnesota		
The National Bank, Edina Commercial/consumer (full srvc bnk)	(024555)	April 11, 2005
New York		
Citizens Bank, National Association, Albany Commercial/consumer (full srvc bnk)	(024571)	May 13, 2005
Community National Bank, Great Neck Estates Village Commercial/consumer (full srvc bnk)	(024523)	April 5, 2005
Ohio		
Lake National Bank, Mentor Commercial/consumer (full srvc bnk)	(024540)	January 18, 2005
South Carolina		
Independence National Bank, Greenville Commercial/consumer (full srvc bnk)	(024564)	May 16, 2005
Tennessee		
Paragon National Bank, Memphis Commercial/consumer (full srvc bnk)	(024538)	January 19, 2005
Virginia		
Sonabank, National Association, Charlottesville Commercial/consumer (full srvc bnk)	(024578)	April 14, 2005

New, limited-purpose national bank charters issued, January 1 to June 30, 2005

Title and location	Charter number	Date
California		
ReconTrust Company, National Association, Thousand Oaks, Trust (non-deposit)	(024559)	January 4, 2005
Connecticut		
RBS National Bank, Bridgeport, Credit card	(024534)	April 1, 2005
Rhode Island		
Bank of America Rhode Island, National Association, Providence, Banker's bank	(024592)	June 3, 2005
Virginia		
Riggs National Trust Company, McLean, Trust (non-deposit)	(024597)	March 29, 2005

State-chartered banks converted to full-service national banks, January 1 to June 30, 2005

Title and location (charter number)	Effective date	Total
Arizona		
Valley Commerce Bank, National Association (024588) conversion of Valley Commerce Bank, Phoenix	April 7, 2005	152,353,000
California		
Rabobank, National Association (024583) conversion of Valley Independent Bank, El Centro	April 4, 2005	2,449,000
Colorado		
First United Bank, National Association (024575) conversion of First United Bank, Englewood	January 3, 2005	159,692,000
Illinois		
Harris Bank Roselle, National Association (024536) conversion of Harris Bank Roselle, Roselle	May 27, 2005	544,303,000
Mississippi		
Community Bank, Indianola, National Association (024580) conversion of Community Bank, Indianola	January 24, 2005	92,976,000
Community Bank, National Association (024579) conversion of Community Bank, Desoto County, Southaven	January 24, 2005	182,680,000

State-chartered bank converted to limited-purpose national bank, January 1 to June 30, 2005

Title and location (charter number)	Effective date	Total assets
Pennsylvania		
National Penn Investors Trust Company (024581) conversion of Investors Trust Company, Wyomissing	May 23, 2005	799,746,000

Nonbanking institutions converted to full-service national banks, January 1 to June 30, 2005

Title and location (charter number)	Effective date	Total
Ohio		
FFSB National Bank (024563		
conversion of First Federal Savings Bank of Eastern Ohio, Zanesville	December 31, 2004	258,437,000
Tennessee		
NBC Interim Bank, National Association (024594)		
conversion of NBC Bank, FSB, Memphis	April 22, 2005	29,726,000
Texas		
Citibank Texas, National Association (024561)		
conversion of First American Bank, SSB, Dallas	March 31, 2005	3,492,720,000
Virginia		
Bedford Federal Savings Bank, National Association (024549)		
conversion of Bedford Federal Savings Bank, Bedford	December 10, 2004	309,166,000

Applications for national bank charters, by state and charter type, January 1 to June 30, 2005

				Charters issued					
	Received	Approved	Denied	New, full-service national bank charters issued	New, limited-purpose national bank charters issued	Full-service national charters issued to converting state-chartered banks	Limited-purpose national charters issued to converting state-chartered banks	Full-service national charters issued to converting nonbanking institutions	Limited-purpose national charters issued to converting nonbanking institutions
Alabama	1	0	0	0	0	0	0	0	0
Alaska	0	0	0	0	0	0	0	0	0
Arizona	1	0	0	1	0	1	0	0	0
Arkansas	0	1	0	1	0	0	0	0	0
California	1	1	0	3	1	1	0	0	0
Colorado	0	0	0	0	0	1	0	0	0
Connecticut	1	1	0	1	1	0	0	0	0
Delaware	1	1	0	0	0	0	0	0	0
District of Columbia	0	0	0	0	0	0	0	0	0
Florida	1	0	0	0	0	0	0	0	0
Georgia	0	0	0	0	0	0	0	0	0
Hawaii	0	0	0	0	0	0	0	0	0
Idaho	0	0	0	0	0	0	0	0	0
Illinois	1	0	0	1	0	1	0	0	0
Indiana	0	0	0	0	0	0	0	0	0
Iowa	0	0	0	0	0	0	0	0	0
Kansas	0	0	0	0	0	0	0	0	0
Kentucky	0	0	0	0	0	0	0	0	0
Louisiana	0	0	0	0	0	0	0	0	0
Maine	0	0	0	0	0	0	0	0	0
Maryland	0	0	0	0	0	0	0	0	0
Massachusetts	0	0	0	0	0	0	0	0	0
Michigan	0	0	0	0	0	0	0	0	0
Minnesota	0	0	0	1	0	0	0	0	0
Mississippi	0	0	0	0	0	2	0	0	0
Missouri	1	0	0	0	0	0	0	0	0
Montana	0	0	0	0	0	0	0	0	0
Nebraska	0	0	0	0	0	0	0	0	0
Nevada	0	1	0	0	0	0	0	0	0
New Hampshire	0	0	0	0	0	0	0	0	0
New Jersey	0	0	0	0	0	0	0	0	0
New Mexico	0	0	0	0	0	0	0	0	0
New York	0	0	0	2	0	0	0	0	0
North Carolina	0	0	0	0	0	0	0	0	0
North Dakota	0	0	0	0	0	0	0	0	0
Ohio	0	0	0	1	0	0	0	1	0
Oklahoma	0	0	0	0	0	0	0	0	0
Oregon	0	0	0	0	0	0	0	0	0
Pennsylvania	0	0	0	0	0	0	1	0	0
Rhode Island	1	1	0	0	1	0	0	0	0
South Carolina	0	1	0	1	0	0	0	0	0
South Dakota	0	0	0	0	0	0	0	0	0
Tennessee	0	0	0	1	0	0	0	1	0
Texas	0	0	0	0	0	0	0	1	0
Utah	0	0	0	0	0	0	0	0	0
Vermont	0	0	0	0	0	0	0	0	0
Virginia	1	2	0	1	1	0	0	1	0

Applications for national bank charters, by state and charter type, January 1 to June 30, 2005 (continued)

				Charters issued					
	Received	Approved	Denied	New, full-service national bank charters issued	New, limited-purpose national bank charters issued	Full-service national charters issued to converting state-chartered banks	Limited-purpose national charters issued to converting state-chartered banks	Full-service national charters issued to converting nonbanking institutions	Limited-purpose national charters issued to converting nonbanking institutions
Washington	0	0	0	0	0	0	0	0	0
West Virginia	0	0	0	0	0	0	0	0	0
Wisconsin	0	0	0	0	0	0	0	0	0
Wyoming	0	0	0	0	0	0	0	0	0
American Samoa	0	0	0	0	0	0	0	0	0
Canal Zone		0	0	0	0	0	0	0	0
Fed St of Micronesia	0	0	0	0	0	0	0	0	0
Guam	0	0	0	0	0	0	0	0	0
No. Mariana Is.	0	0	0	0	0	0	0	0	0
Midway Islands	0	0	0	0	0	0	0	0	0
Puerto Rico	0	0	0	0	0	0	0	0	0
Trust Territories	0	0	0	0	0	0	0	0	0
Virgin Islands	0	0	0	0	0	0	0	0	0
Wake Island	0	0	0	0	0	0	0	0	0
Total	10	9	0	14	4	6	1	4	0

*These figures may also include new national banks chartered to acquire a failed institution, trust company, credit card bank, and other limited charter national banks.

Voluntary liquidations of national banks, January 1 to June 30, 2005

Title and location (charter number)	Effective date	Total
Massachusetts		
Allmerica Trust Company, National Association, Worcester 3,376 (022481)	May 31, 2005	0
Virginia		
Community National Bank, Pulaski 67,780 (022668)	June 25, 2004	0

National banks merged out of the national bank system, January 1 to June 30, 2005

Title and location Charter number	Effective
Alabama	
National Bank of Commerce of Birmingham, Birmingham (018629)	February 18, 2005
California	
Bank of Lodi, National Association, Lodi (017868)	December 10, 2004
National Bank of the Redwoods, Santa Rosa (018541)	March 11, 2005
Colorado	
The First National Bank of Strasburg, Strasburg (011640)	April 14, 2005
First National Bank of Yuma, Yuma (017555)	April 1, 2005
Florida	
The First National Bank of Alachua, Alachua (008980)	May 20, 2005
Kislak National Bank, Miami Lakes (015190)	January 3, 2005
First National Bank of Florida,m Naples (021830)	January 1, 2005
First National Wealth Management Company, Naples (024476)	February 28, 2005
SunTrust BankCard, National Association, Orlando (022626)	April 22, 2005
Georgia	
Futurus Bank, National Association, Alpharetta (023989)	April 1, 2005
Liberty National Bank, Conyers (023349)	December 1, 2004
Illinois	
The First National Bank of Clifton, Clifton (006318)	December 29, 2004
First National Bank in Homer, Homer (011882)	January 14, 2005
The First National Bank of Lerna, Lerna (008224)	December 31, 2004
Kansas	
Emprise Bank National Association, Hillsboro (006120)	May 13, 2005
Minnesota	
The Oakley National Bank of Buffalo, Buffalo (014311)	April 2, 2005
First National Bank of Chaska, Carver (008378)	April 2, 2005
The Klein National Bank of Madison, Madison (013561)	April 2, 2005
First National Bank in Montevideo, Montevideo (013086)	April 2, 2005
The First National Bank of Waconia, Waconia (011410)	April 2, 2005
Missouri	
The First National Bank, Lamar (007684)	December 8, 2004
Ohio	
Steel Valley Bank, National Association, Dillonvale (014011)	January 3, 2005
South Carolina	
First National Bank of the Carolinas, Gaffney (023073)	March 31, 2005
Tennessee	
National Bank of Commerce, Memphis (013681)	April 22, 2005
Texas	
Northwest National Bank of Arlington, Arlington (018380)	June 17, 2005
First National Bank, Lubbock (018479)	February 11, 2005
Virginia	
Riggs Bank National Association, McLean (005046)	May 20, 2005

National banks merged out of the national bank system, January 1 to June 30, 2005 (continued)

Title and location Charter number	Effective
West Virginia	
Belmont National Bank, Wheeling (014050)	June 3, 2005
Wisconsin	
First National Bank in Viroqua, Viroqua (014058)	June 10, 2005

National banks converted out of the national banking system, January 1 to June 30, 2005

Title and location (charter number)	Effective date	Total assets
Arizona		
Parkway Bank Arizona, National Association, Cave Creek (023969)	April 25, 2005	23,080,000
California		
Nara Bank, National Association, Los Angeles (021669)	January 3, 2005	1,200,000,000
Colorado		
The Alamosa National Bank, Alamosa (008541)	December 30, 2004	110,954,000
Florida		
Bank of Florida, A National Association, Naples (023782)	January 1, 2005	219,170,000
Illinois		
Citizens Community Bank of Illinois, National Association, Berwyn (014596)	December 28, 2004	194,134,000
GreatBank, A National Association, Evanston (023339)	June 28, 2005	289,117,000
Oklahoma		
Oklahoma National Bank and Trust Company, Tulsa (023935)	December 23, 2004	252,319,000
Pennsylvania		
The First National Bank of Canton, Canton (002505)	June 28, 2005	67,979,000
The Marion Center National Bank, Marion Center (007819)	March 31, 2005	192,229,000
South Dakota		
First National Bank in Brookings, Brookings (012838)	December 1, 2004	604,733,000
Texas		
The First National Bank of Athens, Athens (004278)	May 9, 2005	216,000,000
The First National Bank of Claude, Claude (007123)	December 30, 2004	83,601,000
Surety Bank, National Association, Fort Worth (015187)	June 1, 2005	58,358,000
The Trust Company, National Association, San Antonio (023236)	June 29, 2005	2,474,000
The Herring National Bank, Vernon (007010)	May 1, 2005	387,000,000
West Virginia		
The First National Bank of Romney, Romney (009766)	December 20, 2004	119,031,000
Wisconsin		
The Pioneer National Bank of Ladysmith, Ladysmith (011826)	June 24, 2005	59,081,000

Federal branches and agencies of foreign banks in operation, January 1 to June 30, 2005

	In operation January 1, 2005	Opened January 1—June 30, 2005	Closed January 1—June 30, 2005	In operation June 30, 2005
Federal branches:				
California	1	0	0	1
District of Columbia	1	0	0	1
Florida	1	0	0	1
New York	35	0	1	34
Washington	1	0	0	1
Limited federal branches:				
California	7	0	0	7
District of Columbia	1	0	0	1
New York	2	0	0	2
Federal agencies:				
Florida	1	0	0	1
Illinois	1	0	0	1
New York	1	0	0	1
Total	52	0	1	51

Financial Performance of National Banks

Financial Performance of National Banks

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Assets, liabilities, and capital accounts of national banks
June 30, 2004, and June 30, 2005
(Dollar figures in millions)

	June 30, 2004	June 30, 2005	Change June 30, 2004-June 30, 2005 fully consolidated	
	Consolidated foreign and domestic	Consolidated foreign and domestic	Amount	Percent
Number of institutions	**1,957**	**1,864**	**(93)**	**(4.75)**
Total assets	**$4,596,343**	**$5,821,502**	**$1,225,159**	**26.66**
Cash and balances due from depositories	**218,547**	**245,149**	**26,601**	**12.17**
Noninterest-bearing balances, currency and coin	144,622	174,727	30,105	20.82
Interest bearing balances	73,925	70,421	(3,504)	(4.74)
Securities	**841,289**	**933,973**	**92,684**	**11.02**
Held-to-maturity securities, amortized cost	28,392	36,982	8,590	30.26
Available-for-sale securities, fair value	812,897	896,991	84,094	10.35
Federal funds sold and securities purchased	**156,176**	**329,356**	**173,180**	**110.89**
Net loans and leases	**2,740,978**	**3,248,163**	**507,185**	**18.50**
Total loans and leases	2,788,853	3,294,812	505,959	18.14
Loans and leases, gross	2,790,811	3,296,703	505,892	18.13
Less: Unearned income	1,959	1,891	(67)	(3.43)
Less: Reserve for losses	47,875	46,649	(1,226)	(2.56)
Assets held in trading account	**202,508**	**486,854**	**284,345**	**140.41**
Other real estate owned	**1,793**	**1,451**	**(341)**	**(19.04)**
Intangible assets	**152,015**	**224,927**	**72,912**	**47.96**
All other assets	**283,036**	**351,629**	**68,593**	**24.23**
Total liabilities and equity capital	**4,596,343**	**5,821,502**	**1,225,159**	**26.66**
Deposits in domestic offices	2,444,608	2,943,236	498,629	20.40
Deposits in foreign offices	539,925	746,821	206,896	38.32
Total deposits	**2,984,533**	**3,690,057**	**705,525**	**23.64**
Noninterest-bearing deposits	581,571	804,913	223,342	38.40
Interest-bearing deposits	2,402,962	2,885,145	482,182	20.07
Federal funds purchased and securities sold	**316,871**	**458,178**	**141,307**	**44.59**
Other borrowed money	**538,921**	**542,607**	**3,686**	**0.68**
Trading liabilities less revaluation losses	**27,682**	**120,686**	**93,004**	**335.97**
Subordinated notes and debentures	**71,403**	**94,936**	**23,533**	**32.96**
All other liabilities	**222,219**	**331,000**	**108,781**	**48.95**
Trading liabilities revaluation losses	73,908	129,436	55,528	75.13
Other	148,311	201,564	53,253	35.91
Total equity capital	**434,715**	**584,038**	**149,322**	**34.35**
Perpetual preferred stock	2,515	3,309	795	31.60
Common stock	12,025	14,344	2,319	19.29
Surplus	255,300	359,118	103,818	40.67
Retained earnings and other comprehensive income	157,827	202,629	44,802	28.39
Other equity capital components	(65)	(170)	(105)	NM

NM indicates calculated percent change is not meaningful.

Quarterly income and expenses of national banks
Second quarter 2004 and second quarter 2005
(Dollar figures in millions)

	Second quarter 2004	Second quarter 2005	Change Second quarter 2004-second quarter 2005 fully consolidated	
	Consolidated foreign and domestic	Consolidated foreign and domestic	Amount	Percent
Number of institutions	**1,957**	**1,864**	**(93)**	**(4.75)**
Net income	**$17,311**	**$17,958**	**$647**	**3.74**
Net interest income	**38,586**	**42,249**	**3,662**	**9.49**
Total interest income	51,905	68,176	16,271	31.35
On loans	39,729	50,421	10,692	26.91
From lease financing receivables	1,275	1,379	104	8.12
On balances due from depositories	302	699	396	131.11
On securities	8,652	10,204	1,552	17.94
From assets held in trading account	1,075	3,199	2,124	197.61
On federal funds sold and securities repurchased	529	1,872	1,343	254.01
Less: Interest expense	13,318	25,927	12,609	94.67
On deposits	8,336	15,679	7,343	88.09
Of federal funds purchased and securities sold	1,271	3,150	1,879	147.85
On demand notes and other borrowed money*	3,004	5,730	2,726	90.75
On subordinated notes and debentures	707	1,368	660	93.33
Less: Provision for losses	**4,896**	**4,373**	**(523)**	**(10.68)**
Noninterest income	**30,866**	**35,815**	**4,949**	**16.03**
From fiduciary activities	2,225	3,091	866	38.90
Service charges on deposits	5,561	6,023	462	8.32
Trading revenue	1,702	1,856	154	9.05
From interest rate exposures	223	372	148	66.50
From foreign exchange exposures	834	1,227	394	47.22
From equity security and index exposures	290	89	(201)	NM
From commodity and other exposures	374	167	(206)	NM
Investment banking brokerage fees	1,286	2,087	801	62.34
Venture capital revenue	4	58	54	NM
Net servicing fees	3,938	2,391	(1,547)	(39.28)
Net securitization income	4,260	4,828	567	13.31
Insurance commissions and fees	573	658	85	14.88
Insurance and reinsurance underwriting income	124	161	38	30.54
Income from other insurance activities	449	497	48	10.58
Net gains on asset sales	2,621	1,659	(962)	(36.70)
Sales of loans and leases	1,209	1,323	114	9.46
Sales of other real estate owned	15	26	10	67.75
Sales of other assets(excluding securities)	1,397	310	(1,087)	NM
Other noninterest income	8,727	13,164	4,437	50.84
Gains/losses on securities	**643**	**687**	**44**	**6.86**
Less: Noninterest expense	**39,242**	**47,662**	**8,421**	**21.46**
Salaries and employee benefits	16,253	19,723	3,469	21.35
Of premises and fixed assets	4,548	5,880	1,332	29.28
Goodwill impairment losses	9	6	(3)	(28.19)
Amortization expense and impairment losses	1,022	1,635	613	59.98
Other noninterest expense	17,413	20,418	3,005	17.26
Less: Taxes on income before extraordinary items	**8,636**	**8,756**	**120**	**1.39**
Income/loss from extraordinary items, net of income taxes	**(10)**	**(1)**	**9**	**NM**
Memoranda:				
Net operating income	16,881	17,523	642	3.80
Income before taxes and extraordinary items	25,958	26,716	758	2.92
Income net of taxes before extraordinary items	17,321	17,959	638	3.68
Cash dividends declared	9,985	11,234	1,249	12.51
Net charge-offs to loan and lease reserve	5,563	4,660	(903)	(16.24)
Charge-offs to loan and lease reserve	7,094	6,516	(578)	(8.15)
Less: Recoveries credited to loan and lease reserve	1,531	1,856	325	21.24

* Includes mortgage indebtedness
NM indicates calculated percent change is not meaningful.

Year-to-date income and expenses of national banks
Through June 30, 2004, and through June 30, 2005
(Dollar figures in millions)

	June 30, 2004	June 30, 2005	Change June 30, 2004-June 30, 2005 fully consolidated	
	Consolidated foreign and domestic	Consolidated foreign and domestic	Amount	Percent
Number of institutions	**1,957**	**1,864**	**(93)**	**(4.75)**
Net income	**$33,191**	**$37,479**	**$4,288**	**12.92**
Net interest income	**75,077**	**84,635**	**9,557**	**12.73**
Total interest income	100,759	133,015	32,255	32.01
On loans	77,347	98,169	20,822	26.92
From lease financing receivables	2,458	2,760	302	12.27
On balances due from depositories	632	1,467	835	132.15
On securities	16,517	20,332	3,815	23.10
From assets held in trading account	2,051	6,107	4,056	197.78
On federal funds sold and securities repurchased	1,101	3,344	2,243	203.80
Less: Interest expense	25,682	48,380	22,698	88.38
On deposits	16,169	29,195	13,026	80.56
Of federal funds purchased and securities sold	2,253	5,732	3,479	154.42
On demand notes and other borrowed money*	5,854	10,838	4,985	85.16
On subordinated notes and debentures	1,406	2,614	1,208	85.87
Less: Provision for losses	**10,051**	**8,577**	**(1,474)**	**(14.66)**
Noninterest income	**58,481**	**72,671**	**14,190**	**24.26**
From fiduciary activities	4,459	6,299	1,840	41.27
Service charges on deposits	10,521	11,484	963	9.15
Trading revenue	3,221	6,013	2,792	86.66
From interest rate exposures	603	1,955	1,352	224.16
From foreign exchange exposures	1,658	2,741	1,083	65.33
From equity security and index exposures	523	937	414	79.03
From commodity and other exposures	455	378	(76)	(16.82)
Investment banking brokerage fees	2,501	4,104	1,603	64.11
Venture capital revenue	42	256	214	512.00
Net servicing fees	7,276	5,866	(1,410)	(19.38)
Net securitization income	8,040	9,373	1,333	16.58
Insurance commissions and fees	1,147	1,274	128	11.15
Insurance and reinsurance underwriting income	250	302	52	20.79
Income from other insurance activities	896	972	76	8.46
Net gains on asset sales	3,991	2,810	(1,181)	(29.59)
Sales of loans and leases	2,424	2,306	(118)	(4.86)
Sales of other real estate owned	35	48	13	37.88
Sales of other assets(excluding securities)	1,532	455	(1,077)	(70.29)
Other noninterest income	17,283	25,192	7,909	45.76
Gains/losses on securities	**1,724**	**569**	**(1,155)**	**(66.99)**
Less: Noninterest expense	**75,644**	**93,524**	**17,879**	**23.64**
Salaries and employee benefits	31,261	40,328	9,067	29.00
Of premises and fixed assets	8,634	11,910	3,277	37.95
Goodwill impairment losses	10	8	(1)	(12.60)
Amortization expense and impairment losses	2,182	3,089	906	41.53
Other noninterest expense	33,558	38,189	4,631	13.80
Less: Taxes on income before extraordinary items	**16,386**	**18,288**	**1,902**	**11.61**
Income/loss from extraordinary items, net of income taxes	**(11)**	**(7)**	**3**	**NM**
Memoranda:				
Net operating income	32,031	37,115	5,083	15.87
Income before taxes and extraordinary items	49,588	55,774	6,187	12.48
Income net of taxes before extraordinary items	33,202	37,486	4,285	12.90
Cash dividends declared	15,840	19,744	3,904	24.65
Net charge-offs to loan and lease reserve	11,285	9,811	(1,473)	(13.06)
Charge-offs to loan and lease reserve	14,279	13,353	(926)	(6.49)
Less: Recoveries credited to loan and lease reserve	2,995	3,542	547	18.26

* Includes mortgage indebtedness
NM indicates calculated percent change is not meaningful.

Assets of national banks by asset size
June 30, 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Total assets	**$5,821,502**	**$40,395**	**$270,233**	**$356,223**	**$5,154,651**	**$8,724,590**
Cash and balances due from	**245,149**	**2,282**	**11,233**	**15,793**	**215,841**	**381,171**
Securities	**933,973**	**11,001**	**63,133**	**76,749**	**783,091**	**1,585,315**
Federal funds sold and securities purchased	**329,356**	**1,686**	**7,525**	**14,822**	**305,322**	**392,219**
Net loans and leases	**3,248,163**	**23,553**	**172,293**	**222,353**	**2,829,964**	**5,058,476**
Total loans and leases	3,294,812	23,893	174,513	225,158	2,871,248	5,129,186
Loans and leases, gross	3,296,703	23,911	174,683	225,289	2,872,820	5,132,111
Less: Unearned income	1,891	19	170	131	1,572	2,925
Less: Reserve for losses	46,649	340	2,220	2,805	41,284	70,711
Assets held in trading account	**486,854**	**0**	**126**	**432**	**486,296**	**524,351**
Other real estate owned	**1,451**	**57**	**242**	**134**	**1,019**	**3,222**
Intangible assets	**224,927**	**120**	**3,393**	**9,422**	**211,991**	**286,390**
All other assets	**351,629**	**1,696**	**12,289**	**16,519**	**321,126**	**493,447**
Gross loans and leases by type:						
Loans secured by real estate	**1,665,892**	**14,890**	**124,186**	**147,495**	**1,379,321**	**2,817,582**
1- to 4-family residential mortgages	781,378	5,927	39,026	49,915	686,510	1,161,553
Home equity loans	325,687	506	6,961	12,252	305,968	434,835
Multifamily residential mortgages	43,116	335	4,135	7,004	31,642	92,593
Commercial RE loans	308,484	4,692	49,408	49,436	204,947	697,110
Construction RE loans	148,272	1,534	18,612	25,519	102,608	337,900
Farmland loans	15,322	1,897	6,042	2,466	4,918	46,303
RE loans from foreign offices	43,633	0	2	904	42,727	47,289
Commercial and industrial loans	**644,968**	**3,749**	**27,507**	**48,711**	**565,001**	**980,301**
Loans to individuals	**596,982**	**2,436**	**13,663**	**20,014**	**560,869**	**813,660**
Credit cards*	274,667	58	1,597	3,199	269,814	338,523
Other revolving credit plans	34,586	40	353	1,156	33,035	39,613
Installment loans	287,729	2,338	11,712	15,659	258,019	435,523
All other loans and leases	**388,862**	**2,836**	**9,327**	**9,068**	**367,630**	**520,568**
Securities by type:						
U.S. Treasury securities	**30,591**	**435**	**2,011**	**2,628**	**25,517**	**52,586**
Mortgage-backed securities	**596,196**	**2,453**	**21,467**	**44,005**	**528,270**	**913,405**
Pass-through securities	456,740	1,930	15,347	22,906	416,558	614,932
Collateralized mortgage obligations	139,455	524	6,120	21,099	111,712	298,473
Other securities	**271,052**	**8,105**	**39,377**	**29,392**	**194,177**	**540,911**
Other U.S. government securities	90,115	5,969	24,449	17,135	42,563	271,465
State and local government securities	56,789	1,808	12,312	8,088	34,581	116,845
Other debt securities	118,451	196	1,913	3,635	112,707	139,582
Equity securities	5,697	132	703	535	4,327	13,019
Memoranda:						
Agricultural production loans	19,623	2,367	5,543	2,123	9,590	48,151
Pledged securities	496,128	4,388	31,995	42,160	417,585	844,595
Book value of securities	929,317	11,050	63,255	76,835	778,176	1,580,605
Available-for-sale securities	892,335	9,450	55,241	67,346	760,298	1,452,264
Held-to-maturity securities	36,982	1,601	8,014	9,489	17,878	128,340
Market value of securities	934,263	11,001	63,158	76,788	783,316	1,585,760
Available-for-sale securities	896,991	9,400	55,119	67,259	765,213	1,456,974
Held-to-maturity securities	37,272	1,601	8,039	9,529	18,103	128,786

Past-due and nonaccrual loans and leases of national banks by asset size
June 30, 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Loans and leases past due 30-89 days	**$25,485**	**$302**	**$1,402**	**$1,261**	**$22,520**	**$39,673**
Loans secured by real estate	**11,635**	**176**	**859**	**554**	**10,046**	**19,572**
1- to 4-family residential mortgages	7,669	93	389	274	6,912	11,802
Home equity loans	1,322	3	27	32	1,261	1,700
Multifamily residential mortgages	170	1	23	12	134	330
Commercial RE loans	1,147	50	245	147	706	3,141
Construction RE loans	807	14	140	82	572	1,804
Farmland loans	88	14	37	7	30	275
RE loans from foreign offices	432	0	0	0	432	520
Commercial and industrial loans	**2,989**	**52**	**282**	**465**	**2,190**	**5,429**
Loans to individuals	**9,676**	**55**	**211**	**200**	**9,210**	**12,851**
Credit cards	5,505	1	43	56	5,405	6,636
Installment loans and other plans	4,171	54	169	144	3,805	6,215
All other loans and leases	**1,184**	**19**	**49**	**42**	**1,074**	**1,820**
Loans and leases past due 90+ days	**11,525**	**69**	**272**	**233**	**10,952**	**14,560**
Loans secured by real estate	**4,522**	**36**	**163**	**92**	**4,232**	**5,965**
1- to 4-family residential mortgages	4,049	21	67	45	3,916	4,859
Home equity loans	126	0	4	5	117	190
Multifamily residential mortgages	26	0	5	2	19	50
Commercial RE loans	158	7	54	23	74	471
Construction RE loans	109	2	22	14	72	268
Farmland loans	23	6	12	3	3	90
RE loans from foreign offices	31	0	0	0	31	37
Commercial and industrial loans	**439**	**12**	**45**	**86**	**295**	**874**
Loans to individuals	**6,353**	**9**	**47**	**47**	**6,249**	**7,404**
Credit cards	4,455	1	27	23	4,405	5,168
Installment loans and other plans	1,898	8	21	24	1,845	2,236
All other loans and leases	**211**	**11**	**17**	**8**	**176**	**316**
Nonaccrual loans and leases	**16,420**	**176**	**977**	**1,155**	**14,111**	**25,200**
Loans secured by real estate	**7,451**	**98**	**671**	**740**	**5,942**	**12,527**
1- to 4-family residential mortgages	3,511	33	183	234	3,061	5,414
Home equity loans	440	2	7	17	416	579
Multifamily residential mortgages	169	3	17	22	127	291
Commercial RE loans	2,011	41	320	367	1,284	4,108
Construction RE loans	550	6	90	78	375	1,082
Farmland loans	161	13	54	23	70	376
RE loans from foreign offices	608	0	0	0	608	676
Commercial and industrial loans	**5,452**	**52**	**226**	**325**	**4,849**	**8,214**
Loans to individuals	**2,449**	**11**	**31**	**55**	**2,352**	**3,008**
Credit cards	336	0	1	19	315	570
Installment loans and other plans	2,114	11	30	36	2,037	2,438
All other loans and leases	**1,136**	**16**	**49**	**35**	**1,036**	**1,552**

Liabilities of national banks by asset size
June 30, 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Total liabilities and equity capital	**5,821,502**	**40,395**	**270,233**	**356,223**	**5,154,651**	**8,724,590**
Deposits in domestic offices	2,943,236	33,524	217,459	241,158	2,451,095	4,899,529
Deposits in foreign offices	746,821	14	266	2,384	744,157	895,168
Total deposits	**3,690,057**	**33,538**	**217,726**	**243,542**	**3,195,251**	**5,794,697**
Noninterest bearing	804,913	6,013	38,173	45,528	715,199	1,170,875
Interest bearing	2,885,145	27,525	179,553	198,014	2,480,052	4,623,822
Federal funds purchased and securities sold	**458,178**	**500**	**6,837**	**31,144**	**419,697**	**642,281**
Other borrowed funds	**542,607**	**1,246**	**14,526**	**34,514**	**492,321**	**760,953**
Trading liabilities less revaluation losses	**120,686**	**0**	**4**	**6**	**120,676**	**120,902**
Subordinated notes and debentures	**94,936**	**1**	**196**	**1,108**	**93,632**	**114,847**
All other liabilities	**331,000**	**294**	**2,403**	**6,562**	**321,740**	**398,635**
Equity capital	**584,038**	**4,816**	**28,541**	**39,347**	**511,333**	**892,275**
Total deposits by depositor:						
Individuals and corporations	2,932,859	20,302	149,845	193,965	2,568,746	4,583,576
U.S., state, and local governments	131,956	3,041	17,078	16,508	95,329	248,825
Depositories in the U.S.	66,813	511	3,606	3,347	59,348	98,262
Foreign banks and governments	200,763	1	291	462	200,009	220,806
Domestic deposits by depositor:						
Individuals and corporations	2,397,371	20,290	149,755	191,748	2,035,578	3,924,776
U.S., state, and local governments	131,956	3,041	17,078	16,508	95,329	248,825
Depositories in the U.S.	39,118	511	3,606	3,347	31,653	62,856
Foreign banks and governments	17,560	1	115	294	17,150	20,340
Foreign deposits by depositor:						
Individuals and corporations	535,487	12	91	2,216	533,168	658,799
Depositories in the U.S.	27,695	0	0	0	27,695	35,406
Foreign banks and governments	183,203	0	176	168	182,859	200,466
Deposits in domestic offices by type:						
Transaction deposits	**427,388**	**10,990**	**53,193**	**34,216**	**328,989**	**757,022**
Demand deposits	329,630	5,922	31,615	25,918	266,175	552,018
Savings deposits	**1,739,169**	**7,950**	**74,527**	**131,433**	**1,525,259**	**2,633,577**
Money market deposit accounts	1,284,341	4,130	41,931	97,627	1,140,653	1,921,013
Other savings deposits	454,828	3,821	32,596	33,806	384,605	712,564
Time deposits	**776,678**	**14,584**	**89,739**	**75,509**	**596,847**	**1,508,930**
Small time deposits	355,811	9,391	51,899	37,886	256,635	713,883
Large time deposits	420,867	5,193	37,840	37,623	340,212	795,047

Off-balance-sheet items of national banks by asset size
June 30, 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Unused commitments	**$4,589,591**	**$56,617**	**$137,464**	**$675,398**	**$3,720,112**	**$5,839,397**
Home equity lines	339,313	372	5,730	11,496	321,715	443,038
Credit card lines	2,836,687	52,515	102,328	608,596	2,073,248	3,387,107
Commercial RE, construction and land	154,290	966	11,173	21,471	120,680	284,806
All other unused commitments	1,259,302	2,764	18,233	33,835	1,204,470	1,724,445
Letters of credit:						
Standby letters of credit	**265,273**	**108**	**1,934**	**5,229**	**258,001**	**346,130**
Financial letters of credit	224,925	65	1,244	3,800	219,817	297,141
Performance letters of credit	40,347	44	690	1,430	38,184	48,989
Commercial letters of credit	**24,707**	**17**	**223**	**608**	**23,859**	**29,304**
Securities lent	**518,787**	**30**	**23**	**1,936**	**516,797**	**1,299,779**
Spot foreign exchange contracts	**690,057**	**0**	**2**	**155**	**689,900**	**730,910**
Credit derivatives (notional value)						
Reporting bank is the guarantor	1,891,078	0	0	0	1,891,078	1,892,435
Reporting bank is the beneficiary	2,200,682	0	60	0	2,200,622	2,212,684
Derivative contracts (notional value)	**94,478,194**	**13**	**4,239**	**16,806**	**94,457,137**	**96,200,813**
Futures and forward contracts	11,256,839	1	1,462	3,937	11,251,439	11,917,959
Interest rate contracts	7,005,632	1	1,454	2,250	7,001,927	7,098,570
Foreign exchange contracts	4,106,637	0	8	1,686	4,104,943	4,674,442
All other futures and forwards	144,569	0	0	0	144,569	144,947
Option contracts	18,839,828	7	1,535	3,159	18,835,128	19,264,578
Interest rate contracts	15,769,632	4	1,486	2,412	15,765,729	16,152,613
Foreign exchange contracts	1,872,592	0	1	705	1,871,886	1,899,439
All other options	1,197,604	2	48	42	1,197,513	1,212,526
Swaps	60,289,766	5	1,181	9,710	60,278,870	60,913,156
Interest rate contracts	58,033,854	5	1,165	9,677	58,023,006	58,598,943
Foreign exchange contracts	2,033,723	0	0	0	2,033,723	2,078,327
All other swaps	222,189	0	16	33	222,141	235,886
Memoranda: Derivatives by purpose						
Contracts held for trading	88,170,606	0	53	4,987	88,165,565	89,596,306
Contracts not held for trading	2,215,828	13	4,125	11,819	2,199,871	2,499,387
Memoranda: Derivatives by position						
Held for trading--positive fair value	1,460,446	0	1	22	1,460,423	1,477,147
Held for trading--negative fair value	1,439,829	0	1	17	1,439,811	1,457,390
Not for trading--positive fair value	15,568	1	16	37	15,516	17,733
Not for trading--negative fair value	14,418	0	20	72	14,325	16,783

Quarterly income and expenses of national banks by asset size
Second quarter 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Net income	**$17,958**	**$108**	**$873**	**$1,351**	**$15,626**	**$27,988**
Net interest income	**42,249**	**391**	**2,533**	**3,024**	**36,301**	**66,722**
Total interest income	68,176	541	3,636	4,549	59,451	105,064
On loans	50,421	416	2,914	3,545	43,546	78,501
From lease financing receivables	1,379	3	14	45	1,317	1,889
On balances due from depositories	699	6	19	34	640	1,145
On securities	10,204	99	604	761	8,739	16,568
From assets held in trading account	3,199	0	6	15	3,178	3,706
On fed. funds sold & securities repurchased	1,872	14	57	119	1,681	2,294
Less: Interest expense	25,927	150	1,103	1,524	23,150	38,342
On deposits	15,679	135	919	961	13,664	24,528
Of federal funds purchased & securities sold	3,150	3	41	222	2,884	4,490
On demand notes & other borrowed money*	5,730	12	139	325	5,255	7,717
On subordinated notes and debentures	1,368	0	3	17	1,348	1,607
Less: Provision for losses	**4,373**	**19**	**145**	**181**	**4,028**	**5,898**
Noninterest income	**35,815**	**140**	**1,235**	**2,319**	**32,120**	**49,384**
From fiduciary activities	3,091	12	179	445	2,455	5,904
Service charges on deposits	6,023	45	326	325	5,328	8,515
Trading revenue	1,856	(0)	1	12	1,844	1,970
From interest rate exposures	372	0	2	5	365	363
From foreign exchange exposures	1,227	0	0	5	1,222	1,301
From equity security and index exposures	89	0	0	(0)	89	131
From commodity and other exposures	167	0	0	0	167	166
Investment banking brokerage fees	2,087	1	20	42	2,024	2,546
Venture capital revenue	58	0	(0)	4	54	55
Net servicing fees	2,391	32	98	117	2,143	2,902
Net securitization income	4,828	0	93	19	4,716	5,862
Insurance commissions and fees	658	10	20	35	593	1,167
Insurance and reinsurance underwriting income	161	0	0	3	158	254
Income from other insurance activities	497	10	20	32	435	913
Net gains on asset sales	1,659	3	74	581	1,001	2,475
Sales of loans and leases	1,323	2	69	559	693	1,994
Sales of other real estate owned	26	(0)	2	7	17	48
Sales of other assets(excluding securities)	310	1	3	16	291	433
Other noninterest income	13,164	37	424	741	11,962	17,991
Gains/losses on securities	**687**	**(0)**	**(2)**	**9**	**680**	**803**
Less: Noninterest expense	**47,662**	**371**	**2,455**	**3,150**	**41,687**	**69,560**
Salaries and employee benefits	19,723	193	1,179	1,363	16,988	29,862
Of premises and fixed assets	5,880	47	297	319	5,217	8,612
Goodwill impairment losses	6	0	6	0	0	7
Amortization expense and impairment losses	1,635	1	28	107	1,500	1,860
Other noninterest expense	20,418	129	946	1,361	17,982	29,219
Less: Taxes on income before extraord. items	**8,756**	**33**	**293**	**671**	**7,759**	**13,465**
Income/loss from extraord. items, net of taxes	**(7)**	**1**	**0**	**(0)**	**(8)**	**5**
Memoranda:						
Net operating income	17,523	109	874	1,345	15,196	27,469
Income before taxes and extraordinary items	26,716	141	1,166	2,022	23,387	41,451
Income net of taxes before extraordinary items	17,959	108	873	1,351	15,627	27,986
Cash dividends declared	11,234	77	548	969	9,641	16,355
Net loan and lease losses	4,660	13	106	172	4,369	6,002
Charge-offs to loan and lease reserve	6,516	19	143	239	6,115	8,417
Less: Recoveries credited to loan & lease resv.	1,856	6	37	66	1,746	2,414

* Includes mortgage indebtedness

Year-to-date income and expenses of national banks by asset size
Through June 30, 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Net income	**$37,479**	**$215**	**$1,763**	**$2,649**	**$32,852**	**$57,439**
Net interest income	**84,635**	**768**	**4,959**	**5,960**	**72,948**	**132,938**
Total interest income	133,015	1,051	7,030	8,766	116,168	204,685
On loans	98,169	807	5,625	6,842	84,894	152,684
From lease financing receivables	2,760	6	28	88	2,638	3,786
On balances due from depositories	1,467	11	36	56	1,364	2,364
On securities	20,332	196	1,188	1,484	17,465	32,843
From assets held in trading account	6,107	0	7	16	6,084	6,867
On fed. funds sold & securities repurchased	3,344	26	107	220	2,990	4,209
Less: Interest expense	48,380	283	2,071	2,806	43,220	71,747
On deposits	29,195	255	1,722	1,752	25,466	45,747
Of federal funds purchased & securities sold	5,732	6	74	398	5,255	8,234
On demand notes & other borrowed money*	10,838	22	268	625	9,923	14,690
On subordinated notes and debentures	2,614	0	6	32	2,576	3,077
Less: Provision for losses	**8,577**	**33**	**272**	**348**	**7,924**	**11,398**
Noninterest income	**72,671**	**271**	**2,504**	**4,500**	**65,397**	**99,738**
From fiduciary activities	6,299	23	355	896	5,025	11,791
Service charges on deposits	11,484	86	622	614	10,163	16,363
Trading revenue	6,013	(0)	2	22	5,989	6,419
From interest rate exposures	1,955	0	3	12	1,940	2,007
From foreign exchange exposures	2,741	0	0	7	2,734	3,000
From equity security and index exposures	937	0	0	0	937	1,019
From commodity and other exposures	378	0	0	0	378	378
Investment banking brokerage fees	4,104	2	39	81	3,982	5,020
Venture capital revenue	256	0	(1)	4	253	253
Net servicing fees	5,866	60	191	239	5,376	7,133
Net securitization income	9,373	0	212	46	9,114	11,502
Insurance commissions and fees	1,274	19	41	73	1,141	2,211
Insurance and reinsurance underwriting income	302	0	0	5	296	432
Income from other insurance activities	972	19	41	68	844	1,778
Net gains on asset sales	2,810	6	139	1,100	1,564	4,322
Sales of loans and leases	2,306	5	126	1,058	1,118	3,613
Sales of other real estate owned	48	0	3	16	29	95
Sales of other assets(excluding securities)	455	2	10	26	417	614
Other noninterest income	25,192	75	903	1,424	22,790	34,725
Gains/losses on securities	**569**	**(0)**	**11**	**6**	**553**	**775**
Less: Noninterest expense	**93,524**	**730**	**4,842**	**6,155**	**81,797**	**137,043**
Salaries and employee benefits	40,328	379	2,342	2,703	34,903	60,676
Of premises and fixed assets	11,910	93	587	627	10,603	17,342
Goodwill impairment losses	8	2	6	0	0	11
Amortization expense and impairment losses	3,089	2	52	209	2,825	3,568
Other noninterest expense	38,189	253	1,854	2,615	33,466	55,447
Less: Taxes on income before extraord. items	**18,288**	**62**	**598**	**1,312**	**16,316**	**27,575**
Income/loss from extraord. items, net of taxes	**(7)**	**1**	**0**	**(0)**	**(8)**	**5**
Memoranda:						
Net operating income	37,115	214	1,756	2,645	32,500	56,917
Income before taxes and extraordinary items	55,774	276	2,361	3,962	49,176	85,009
Income net of taxes before extraordinary items	37,486	214	1,763	2,649	32,860	57,434
Cash dividends declared	19,744	155	981	1,635	16,973	30,171
Net loan and lease losses	9,811	20	192	342	9,258	12,479
Charge-offs to loan and lease reserve	13,353	32	265	489	12,567	17,127
Less: Recoveries credited to loan & lease resv.	3,542	13	73	147	3,309	4,648

* Includes mortgage indebtedness

Quarterly net loan and lease losses of national banks by asset size
Second quarter 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Net charge-offs to loan and lease reserve	**$4,660**	**$13**	**$106**	**$172**	**$4,369**	**$6,002**
Loans secured by real estate	**247**	**3**	**25**	**28**	**191**	**412**
1- to 4-family residential mortgages	104	1	5	8	91	161
Home equity loans	74	0	1	2	71	101
Multifamily residential mortgages	8	1	2	1	4	10
Commercial RE loans	50	1	12	16	21	114
Construction RE loans	(6)	0	1	1	(8)	6
Farmland loans	7	0	5	1	1	11
RE loans from foreign offices	11	0	0	0	11	9
Commercial and industrial loans	**267**	**5**	**27**	**51**	**184**	**548**
Loans to individuals	**4,127**	**4**	**40**	**85**	**3,997**	**4,975**
Credit cards	3,143	0	24	42	3,077	3,774
Installment loans and other plans	983	4	16	43	920	1,201
All other loans and leases	**20**	**1**	**14**	**9**	**(3)**	**68**
Charge-offs to loan and lease reserve	**6,516**	**19**	**143**	**239**	**6,115**	**8,417**
Loans secured by real estate	**376**	**4**	**31**	**37**	**304**	**613**
1- to 4-family residential mortgages	162	2	7	11	142	244
Home equity loans	93	0	1	3	89	127
Multifamily residential mortgages	10	1	2	2	6	13
Commercial RE loans	73	1	14	19	39	164
Construction RE loans	11	0	2	1	7	31
Farmland loans	8	0	5	1	2	16
RE loans from foreign offices	19	0	0	0	19	18
Commercial and industrial loans	**781**	**7**	**39**	**68**	**667**	**1,205**
Loans to individuals	**5,130**	**7**	**55**	**120**	**4,947**	**6,285**
Credit cards	3,797	0	29	56	3,711	4,590
Installment loans and other plans	1,332	7	26	64	1,236	1,695
All other loans and leases	**229**	**1**	**17**	**14**	**196**	**313**
Recoveries credited to loan and lease reserve	**1,856**	**6**	**37**	**66**	**1,746**	**2,414**
Loans secured by real estate	**129**	**1**	**6**	**9**	**113**	**201**
1- to 4-family residential mortgages	58	1	2	3	51	82
Home equity loans	19	0	0	1	18	26
Multifamily residential mortgages	2	0	0	0	2	3
Commercial RE loans	24	0	2	4	18	50
Construction RE loans	17	0	1	1	15	25
Farmland loans	2	0	0	0	1	5
RE loans from foreign offices	8	0	0	0	8	9
Commercial and industrial loans	**514**	**2**	**13**	**17**	**483**	**658**
Loans to individuals	**1,003**	**3**	**15**	**35**	**950**	**1,310**
Credit cards	654	0	5	15	634	816
Installment loans and other plans	349	2	10	20	316	494
All other loans and leases	**209**	**0**	**3**	**5**	**200**	**245**

Year-to-date net loan and lease losses of national banks by asset size
Through June 30, 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
Number of institutions reporting	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Net charge-offs to loan and lease reserve	**9,811**	**20**	**192**	**342**	**9,258**	**12,479**
Loans secured by real estate	**501**	**3**	**37**	**48**	**413**	**810**
1- to 4-family residential mortgages	229	2	11	14	202	352
Home equity loans	142	0	2	4	137	195
Multifamily residential mortgages	11	1	3	1	6	14
Commercial RE loans	70	1	14	25	30	172
Construction RE loans	13	0	2	4	7	38
Farmland loans	8	(0)	5	1	3	13
RE loans from foreign offices	28	0	0	0	28	26
Commercial and industrial loans	**543**	**8**	**48**	**119**	**368**	**1,075**
Loans to individuals	**8,632**	**7**	**89**	**159**	**8,377**	**10,348**
Credit cards	6,576	1	59	55	6,461	7,830
Installment loans and other plans	2,056	7	30	104	1,915	2,518
All other loans and leases	**134**	**1**	**18**	**15**	**100**	**246**
Charge-offs to loan and lease reserve	**13,353**	**32**	**265**	**489**	**12,567**	**17,127**
Loans secured by real estate	**741**	**6**	**50**	**63**	**622**	**1,178**
1- to 4-family residential mortgages	333	3	16	19	295	500
Home equity loans	181	0	2	5	173	246
Multifamily residential mortgages	13	1	3	2	8	18
Commercial RE loans	123	1	19	31	72	275
Construction RE loans	36	0	4	5	27	74
Farmland loans	11	0	6	1	4	22
RE loans from foreign offices	43	0	0	0	43	44
Commercial and industrial loans	**1,529**	**12**	**70**	**159**	**1,288**	**2,331**
Loans to individuals	**10,623**	**13**	**119**	**239**	**10,252**	**12,968**
Credit cards	7,877	1	69	95	7,711	9,461
Installment loans and other plans	2,746	12	50	144	2,541	3,507
All other loans and leases	**461**	**2**	**27**	**28**	**404**	**649**
Recoveries credited to loan and lease reserve	**3,542**	**13**	**73**	**147**	**3,309**	**4,648**
Loans secured by real estate	**240**	**3**	**13**	**15**	**209**	**368**
1- to 4-family residential mortgages	104	1	5	5	93	148
Home equity loans	39	0	0	2	37	51
Multifamily residential mortgages	2	0	0	0	2	4
Commercial RE loans	53	1	5	7	41	102
Construction RE loans	23	0	2	1	20	36
Farmland loans	3	1	1	0	1	8
RE loans from foreign offices	15	0	0	0	15	17
Commercial and industrial loans	**985**	**4**	**22**	**39**	**920**	**1,256**
Loans to individuals	**1,991**	**5**	**31**	**80**	**1,875**	**2,620**
Credit cards	1,301	0	10	40	1,250	1,631
Installment loans and other plans	690	5	20	39	625	989
All other loans and leases	**326**	**1**	**8**	**13**	**304**	**404**

Number of national banks by state and asset size
June 30, 2005

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
All institutions	**1,864**	**728**	**965**	**126**	**45**	**7,549**
Alabama	22	11	10	0	1	149
Alaska	2	1	0	1	0	5
Arizona	15	3	7	4	1	47
Arkansas	39	10	27	2	0	156
California	73	17	41	13	2	268
Colorado	43	17	23	3	0	164
Connecticut	10	1	7	1	1	24
Delaware	8	0	3	2	3	27
District of Columbia	4	1	3	0	0	6
Florida	61	8	47	6	0	255
Georgia	52	12	39	1	0	327
Hawaii	1	0	1	0	0	5
Idaho	1	0	1	0	0	14
Illinois	147	58	82	4	3	617
Indiana	31	6	17	7	1	136
Iowa	45	19	25	1	0	394
Kansas	93	59	30	4	0	354
Kentucky	42	17	24	0	1	207
Louisiana	14	3	9	1	1	136
Maine	3	0	1	1	1	15
Maryland	10	2	7	1	0	64
Massachusetts	11	2	8	1	0	37
Michigan	22	8	13	0	1	153
Minnesota	106	60	42	3	1	449
Mississippi	19	6	11	2	0	93
Missouri	44	20	19	4	1	341
Montana	14	11	3	0	0	79
Nebraska	67	45	20	2	0	251
Nevada	7	1	1	4	1	36
New Hampshire	4	1	1	1	1	13
New Jersey	21	0	13	5	3	73
New Mexico	14	3	8	3	0	48
New York	56	13	33	8	2	133
North Carolina	5	0	3	0	2	74
North Dakota	12	6	4	2	0	97
Ohio	78	32	34	5	7	178
Oklahoma	81	41	38	1	1	268
Oregon	3	1	1	1	0	37
Pennsylvania	71	15	44	9	3	161
Rhode Island	3	2	0	1	0	7
South Carolina	24	5	17	2	0	75
South Dakota	17	6	8	1	2	87
Tennessee	28	7	19	1	1	184
Texas	307	155	137	15	0	637
Utah	7	2	3	0	2	62
Vermont	8	2	6	0	0	14
Virginia	38	7	29	1	1	124
Washington	13	7	6	0	0	80
West Virginia	15	8	6	1	0	65
Wisconsin	38	11	25	1	1	266
Wyoming	15	6	9	0	0	41
U.S. territories	0	0	0	0	0	16

Total assets of national banks by state and asset size
June 30, 2005
(Dollar figures in millions)

	All national banks	National banks: Less than $100 million	$100 million to $1 billion	$1 billion to $10 billion	Greater than $10 billion	Memoranda: All commercial banks
All institutions	**$5,821,502**	**$40,395**	**$270,233**	**$356,223**	**$5,154,651**	**$8,724,590**
Alabama	24,063	767	2,327	0	20,968	212,333
Alaska	2,271	67	0	2,204	0	3,623
Arizona	68,670	122	2,796	8,317	57,435	73,366
Arkansas	10,282	574	7,305	2,403	0	40,336
California	112,527	1,008	10,696	36,034	64,789	295,000
Colorado	11,295	782	5,906	4,607	0	38,787
Connecticut	23,364	95	2,485	3,545	17,239	25,076
Delaware	297,839	0	736	8,090	289,013	344,998
District of Columbia	678	92	586	0	0	786
Florida	32,065	602	12,858	18,605	0	89,882
Georgia	15,346	612	8,556	6,178	0	251,149
Hawaii	433	0	433	0	0	27,056
Idaho	310	0	310	0	0	4,709
Illinois	169,410	3,300	21,719	18,142	126,248	316,372
Indiana	54,495	362	7,038	18,593	28,502	87,980
Iowa	9,654	1,126	6,765	1,763	0	46,429
Kansas	18,276	3,098	8,883	6,296	0	45,894
Kentucky	16,187	1,171	4,798	0	10,218	49,342
Louisiana	33,352	142	2,269	8,908	22,033	56,112
Maine	33,716	0	930	1,095	31,691	37,345
Maryland	3,053	129	1,623	1,301	0	40,037
Massachusetts	9,512	117	1,986	7,409	0	163,578
Michigan	42,712	405	3,108	0	39,199	191,229
Minnesota	30,080	3,095	9,063	5,198	12,723	61,773
Mississippi	12,361	355	2,964	9,041	0	43,031
Missouri	30,317	1,205	5,286	11,197	12,629	88,199
Montana	1,533	641	892	0	0	14,807
Nebraska	14,653	2,171	4,512	7,970	0	31,512
Nevada	27,379	53	123	9,647	17,555	56,881
New Hampshire	15,036	59	229	1,626	13,123	17,483
New Jersey	66,188	0	3,930	14,954	47,303	110,413
New Mexico	6,728	144	1,820	4,764	0	13,102
New York	753,672	893	12,138	20,267	720,374	1,064,309
North Carolina	1,509,099	0	2,033	0	1,507,066	1,647,782
North Dakota	6,986	307	1,563	5,116	0	15,128
Ohio	1,441,524	1,899	11,521	11,596	1,416,508	1,532,300
Oklahoma	26,299	2,269	9,191	1,966	12,873	49,696
Oregon	7,266	49	216	7,001	0	21,967
Pennsylvania	166,644	944	14,627	27,545	123,529	213,139
Rhode Island	1,930	64	0	1,867	0	17,926
South Carolina	9,741	306	4,471	4,964	0	39,813
South Dakota	420,847	220	3,149	6,120	411,358	432,095
Tennessee	46,618	573	7,597	1,556	36,892	75,846
Texas	88,891	8,133	36,330	44,428	0	161,750
Utah	32,459	96	540	0	31,824	151,910
Vermont	1,622	119	1,503	0	0	6,646
Virginia	76,955	355	9,217	1,923	65,459	158,229
Washington	2,145	382	1,763	0	0	28,436
West Virginia	4,467	505	1,459	2,502	0	19,653
Wisconsin	28,290	636	8,069	1,487	18,098	101,868
Wyoming	2,264	347	1,917	0	0	5,423
U.S. territories	0	0	0	0	0	102,057

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