

KATHY HOCHUL  
Governor



ADRIENNE A. HARRIS  
Superintendent

The Honorable Kathy Hochul  
Governor  
State of New York  
Albany, NY 12224

The Honorable Andrea Stewart-Cousins  
Senate Majority Leader and Temporary  
President  
New York State Senate  
Albany, NY 12247

The Honorable James Sanders, Jr.  
Chair, Senate Banking Committee  
New York State Senate  
Albany, NY 12247

The Honorable Robert G. Ort  
Minority Leader  
New York State Senate  
Albany, NY 12247

The Honorable George M. Borello  
Ranking Member, Senate Banking  
Committee  
New York State Senate  
Albany, NY 12247

The Honorable Carl E. Heastie  
Speaker  
New York State Assembly  
Albany, NY 12248

The Honorable Pamela Hunter  
Chair, Assembly Banking Committee  
New York State Assembly  
Albany, NY 12248

The Honorable Brian Curran  
Ranking Member, Assembly Banking  
Committee  
New York State Assembly  
Albany, NY 12248

The Honorable William A. Barclay  
Minority Leader  
New York State Assembly  
Albany, NY 12248

Dear Leaders of the Legislature:

Enclosed is the 2022 Wild Card report required by Section 12-a of the New York Banking Law.

Section 12-a of the Banking Law, commonly referred to as the Wild Card section, authorizes the Superintendent of Financial Services to permit state-chartered banking organizations to exercise powers that are available to corresponding federally chartered institutions but not authorized by New York law.

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

State-chartered banking institutions are an important part of the New York State economy. At the end of 2022, state-chartered banks, credit unions and licensed foreign branches and agencies had a total of 100,475 full-time employees, an increase of 7,016 from the 93,459 full-time employees at the end of 2021. Deposits in New York State for state-chartered banks and credit unions grew to \$804.0 billion in 2022 from \$715.3 billion in 2021.

I hope you'll find the report informative and useful.

Sincerely,

Adrienne A. Harris  
Superintendent of Financial Services

Cc: Elizabeth Fine, Counsel to the Governor

# 2022 BANKING WILD CARD REPORT

**Adrienne A. Harris, Superintendent**

June 1, 2023



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## INTRODUCTION

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The banking system in the United States permits all banking institutions, including banks, trust companies, thrift institutions, credit unions and branches of non-U.S. banks, to choose to operate under either a federal or state charter or license.<sup>1</sup> New York State's Wild Card authority allows the Superintendent of Financial Services to address evolving federal banking laws. When federal statutes, regulations or interpretations grant powers to federally chartered institutions that state-chartered institutions do not enjoy, the Superintendent may authorize one or more state-chartered banking organizations of the same type to exercise the same powers.

In 2022, two Wild Card requests were received. One authorization was issued by the Superintendent. The other was being processed at the end of 2022, and subsequently was approved in January 2023.

## ASSESSING CHARTER ACTIONS

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### Commercial Banks and Trust Companies

The Superintendent's ability to grant Wild Card authorizations remains important because the Wild Card powers enable the state charter to provide the same banking powers as the federal charter.

The Dodd-Frank Wall Street Reform and Consumer Protection Act: (i) limited the ability of the Comptroller of the Currency to preempt state law, (ii) specifically precluded preemption for subsidiaries and affiliates of banks, and (iii) made clear that State consumer protection laws may go beyond the rules established by the Consumer Financial Protection Bureau. The Dodd-Frank Act has lessened the attractiveness of federal banking charters as a lever to preempt state laws and increased the importance of factors other than preemption.

At the end of 2022, there were 53 state-chartered commercial banks and trust companies in New York, operating in 1,689 domestic offices, with assets of \$1.3 trillion and 80,553 employees. That compares with 72 state chartered commercial banks and trust companies at the beginning of 2012, operating in 1,432 domestic offices, with \$564.1 billion in assets and 57,554 employees. In that 10-year period, 24 institutions merged into other institutions, two voluntarily liquidated, five converted from a federal to a state charter, one converted from state to federal, and three new institutions were chartered. In addition, two federally chartered commercial banks merged into and subsequently operated as part of two state-chartered trust companies.

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<sup>1</sup> DFS also supervises non-depository institutions, which are not banks and therefore are not subject to the dual banking system.

## **Thrift Institutions**

The Home Owners Loan Act, which governs federal thrift banking activities, provided for broad preemption of state laws affecting banking activities. Thus, persons interested in forming a thrift institution, even if they had no intention ever to engage in interstate banking activities, may have had the view that the federal thrift charter provided greater flexibility in the conduct of banking activities even with the existence of a Wild Card law applicable to state thrift institutions. On the other hand, the provisions of the Dodd-Frank Act abolishing the Office of Thrift Supervision and transferring its functions relating to federal savings associations to the Office of the Comptroller of the Currency may have reduced the relative attractiveness of a federal thrift charter. At the end of 2022, there were 15 thrift institutions, operating in 246 offices with 3,733 employees, with assets of \$40,103,319,000. . At the beginning of 2012, there were 22 state-chartered thrift institutions doing business in 494 domestic offices, with \$70.2 billion in assets, and 6,182 employees. Since 2012, six thrift institutions have converted from a federal charter to a state charter (three subsequently merged into other banks), 10 have merged into other institutions, two have converted to commercial banks and subsequently merged into two other commercial banks, and four have consolidated into a state-chartered thrift.

## **Credit Unions**

At the beginning of 2012 there were 20 state-chartered credit unions operating in 87 offices, with 1,140 employees and \$6.1 billion in assets. There were also 407 federally chartered credit unions operating from 1,411 offices with 9,711 employees and \$51.8 billion in assets. Since then, there has been a steady decline in the number of credit unions due to mergers, closures, and conversions. At the end of 2022, although the number of state-chartered credit unions had fallen to 15, those remaining operated from 124 offices with 2,549 employees and \$17.9 billion in assets. At the same time, the number of federally chartered credit unions fell to 283, operating from 1,214 offices, with 12,603 employees and \$98.2 billion in assets.

The Department has seen some interest by federally chartered credit unions in converting to a state charter during the past five years. In that period, six federally chartered credit unions converted to a New York State charter. Two later merged into a state-chartered credit union. In addition, three federally chartered credit unions merged into state-chartered credit unions.

In appreciation of the significant role that New York State-chartered credit unions play in providing financial services to their members and communities, New York's Governor signed legislation in 2015 allowing credit unions to expand their field of membership by combining employer, trade association, and community groups into a single field of membership. The law, which amended Section 451-a of the New York Banking Law, provides New York credit unions with the opportunity to significantly expand their membership and serve the broader public.

New York law also provides that, in considering applications relating to fields of membership, the Superintendent of DFS shall consider a credit union's record and history of serving underserved areas, as well as low- and moderate-income individuals within the communities it currently serves, and its commitment to serving those communities in the future.

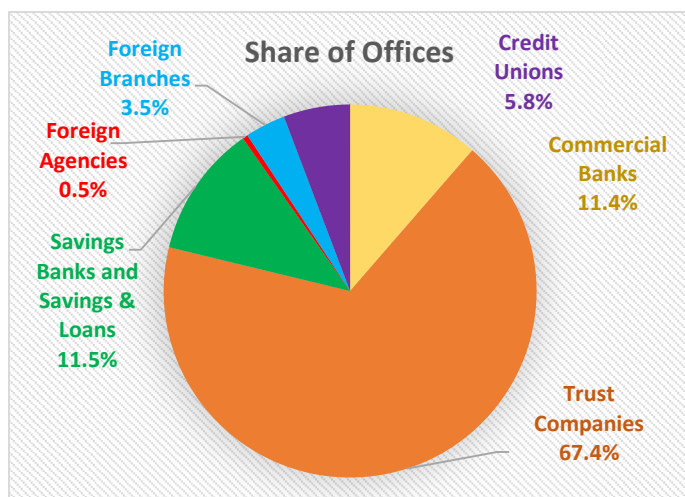
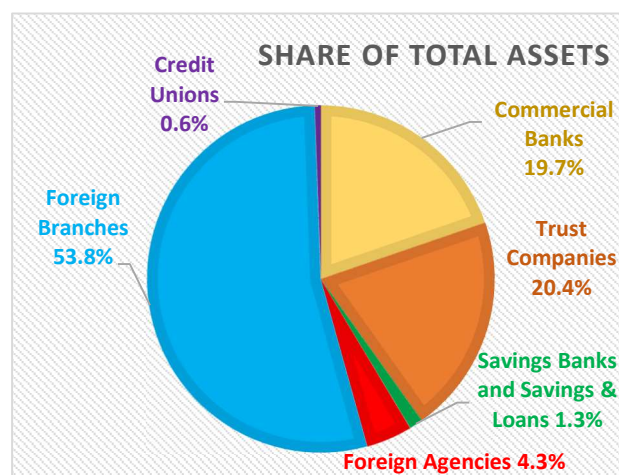
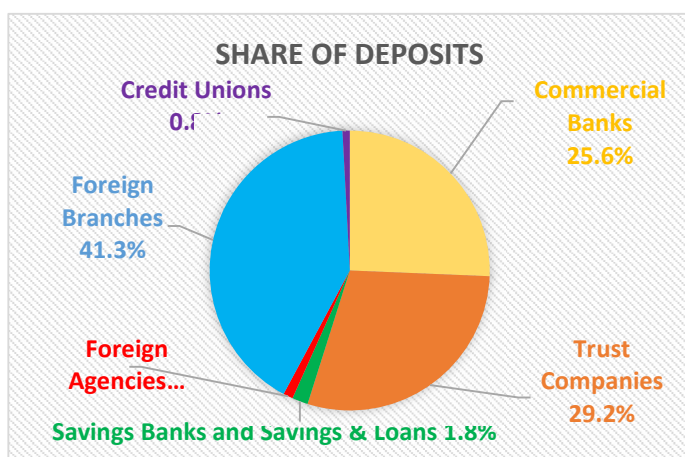
DFS encourages all credit unions to take advantage of New York law to provide financial services to all New Yorkers and will conduct timely reviews of all applications by new or existing credit unions seeking to be chartered by New York State.

### Foreign Branches and Agencies

New York has the largest number of branches and agencies of foreign banks. At the beginning of 2012, there were 101 such state-licensed branches and agencies in New York with total assets of \$1.7 trillion and 14,921 employees. At that same time, there were 28 federally licensed branches and agencies, with assets of \$183.2 billion and 2,048 employees. As of year-end 2022, there were 82 such state-licensed bank branches and agencies in New York with total assets of \$1.8 trillion and 13,640 employees. At that time, there were 30 federally licensed branches and agencies with \$681.9 billion in assets and 7,541 employees.

### Branch Openings

In 2022, there were 22 branch openings of New York State-chartered banking institutions, compared with 25 in 2021. Combined with branch closings and mergers, this brought the total number of New York State-chartered banking institution branches to 1,935 in 2022, down from 2,049 in 2021.



## **SECTION I: INSTITUTIONS RETAINED, ESTABLISHED, CONVERTED, ACQUIRED OR MERGED**

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### **Savings Banks and Savings and Loan Associations**

- New York Community Bank merged into and subsequently operated as part of federally chartered Flagstar Bank as of December 1, 2022.
- Elmira Savings Bank merged into and subsequently operated as part of federally chartered Community Bank National Association as of May 14, 2022.

Thus, by December 31, 2022, the number of state-chartered savings institutions had fallen to 15.

### **Commercial Banks and Trust Companies**

- Bank Leumi USA merged into and subsequently operated as part of federally chartered Valley National Bank, as of April 1, 2022.
- Citizen Bank of Cape Vincent merged into and subsequently operated as part of state-chartered Gouverneur Savings and Loan Association as of September 16, 2022.
- Mahopac Bank merged into and subsequently operated as part of state-chartered Tompkins Community Bank as of January 1, 2022.
- The Bank of Castile merged into and subsequently operated as part of state-chartered Tompkins Community Bank as of January 1, 2022.
- GS&L Municipal Bank obtained a new charter as of September 16, 2022.

There were 53 state-chartered commercial banks and trust companies at December 31, 2022.

### **Credit Unions**

- Empire Branch 36 NA of the Letter Carriers Credit Union merged into and subsequently operated as part of federally chartered Rockland Employees Federal Credit Union on July 31, 2021.
- Core Federal Credit Union merged into and subsequently operated as part of state-chartered CFCU Credit Union on May 1, 2022.
- Countryside Federal Credit Union merged into and subsequently operated as part of state-chartered Northern Credit Union on September 1, 2022.

The number of state-chartered credit unions had fallen to 15 by December 31, 2022.

### **Foreign Bank Branches and Agencies**

- Portigon AG's New York branch surrendered its license as of April 26, 2022.

Thus, the number of state-licensed foreign branches and agencies fell to 82 by December 31, 2022.

## **SECTION II: EMPLOYMENT IN THE NEW YORK BANKING SECTOR**

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There is no definitive way to measure the total number of jobs created in New York State as a result of the establishment of state-chartered banks and trust companies. When a new charter



is granted, there is direct employment created at the new institution. On the other hand, where charter action occurs as a result of a merger, job reductions often take place, as the merged entity typically eliminates overlaps in its business and management structure. This is particularly true for personnel associated with the management and “back-office” processing operations of the combined institution. This is less likely to be the case with mergers between in state and out-of-state institutions that do not conduct overlapping interstate banking operations.

At the end of 2022, there were 165 state-chartered banks and credit unions and licensed foreign branches and agencies with total assets of \$3,184,216,844,000 and 100,475 full-time employees. This represents an increase of \$874,643,312,000 in assets and 20,678 in employees from a decade ago. At the beginning of 2012, there were 215 state-chartered banks and credit unions and licensed foreign branches and agencies with total assets of \$2,309,573,532,000 and employing 79,797 persons.

**SECTION III: TOTAL CHARTERED INSTITUTIONS AND DEPOSITS IN NEW YORK\*****Domestic Banks with Offices In New York**

State of Headquarters	Federally Chartered Commercial Banks and Trusts	Federally Chartered Thrifts	Non NY State Chartered	NY State Chartered	Total
AR	0	0	1	0	1
CA	1	0	10	0	11
CT	2	0	3	0	5
DC	0	0	1	0	1
DE	4	0	0	0	4
FL	1	0	1	0	2
GA	1	0	2	0	3
IL	0	0	2	0	2
KS	1	0	0	0	1
MA	0	0	1	0	1
MI	0	1	0	0	1
NC	1	0	0	0	1
NJ	3	0	7	0	10
NY	31	21	0	69	121
OH	2	0	0	0	2
PA	1	0	10	0	11
RI	1	0	0	0	1
SD	2	0	0	0	2
TN	0	0	1	0	1
TX	1	0	0	0	1
VA	2	0	0	0	2
<b>Total</b>	<b>54</b>	<b>22</b>	<b>39</b>	<b>69</b>	<b>184</b>

\*All data reported in this section was tabulated as of June 30, 2022, to be consistent with deposit data from the FDIC.

At June 30, 2022, there were 10 fewer institutions and 173 fewer offices than at June 30, 2021; however, deposits rose to \$165.9 billion.

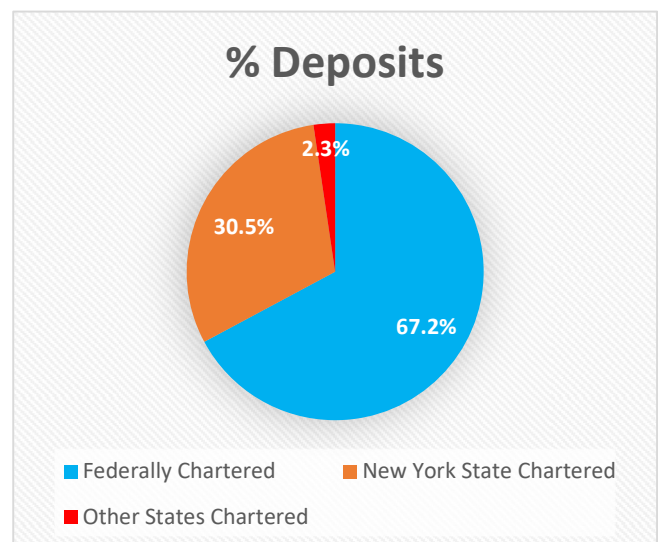
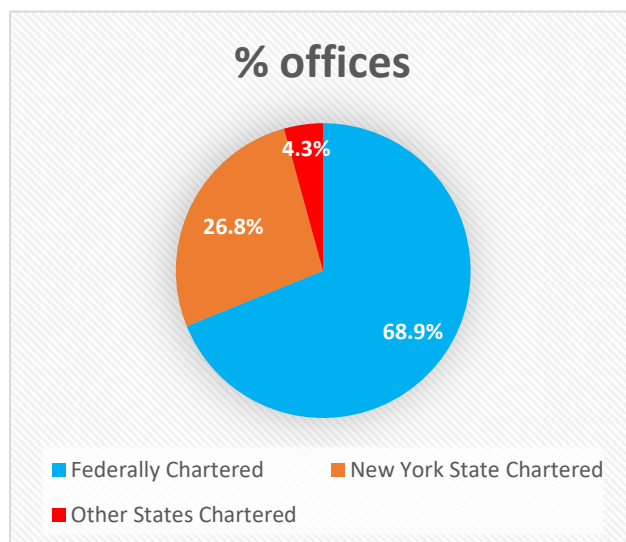
## Branches in New York

State of Headquarters	Federally Chartered Commercial Banks and Trusts	Federally Chartered Thrifts	Non NY State Chartered	NY State Chartered	Total
AR	0	0	1	0	1
CA	6	0	49	0	55
CT	82	0	9	0	91
DC	0	0	1	0	1
DE	328	0	0	0	328
FL	4	0	1	0	5
GA	1	0	3	0	4
IL	0	0	2	0	2
KS	1	0	0	0	1
MA	0	0	29	0	29
MI	0	1	0	0	1
NC	267	0	0	0	267
NJ	53	0	21	0	74
NY	515	218	0	1,144	1,877
OH	830	0	0	0	830
PA	3	0	66	0	69
RI	213	0	0	0	213
SD	300	0	0	0	300
TN	0	0	1	0	1
TX	15	0	0	0	15
VA	98	0	0	0	98
<b>Total</b>	<b>2,716</b>	<b>219</b>	<b>183</b>	<b>1,144</b>	<b>4,262</b>

## Deposits at Branches in New York

State of Headquarters	Federally Chartered Commercial Banks and Trusts	Federally Chartered Thrifts	Non-NY State-Chartered	NY State-Chartered	Total
AR	0	0	122,990	0	122,990
CA	16,920,226	0	42,238,996	0	59,159,222
CT	24,288,278	0	993,755	0	25,282,033
DC	0	0	25,186	0	25,186
DE	70,160,961	0	0	0	70,160,961
FL	12,552,809	0	28,515	0	12,581,324
GA	0	0	78,678	0	78,678
IL	0	0	511,356	0	511,356
KS	595	0	0	0	595
MA	0	0	1,902,300	0	1,902,300
MI	0	44,867	0	0	44,867
NC	139,428,035	0	0	0	139,428,035
NJ	9,365,661	0	1,677,938	0	11,043,599
NY	229,851,044	17,628,117	0	788,486,580	1,035,965,741
OH	877,547,483	0	0	0	877,547,483
PA	0	0	12,389,791	0	12,389,791
RI	23,577,093	0	0	0	23,577,093
SD	169,187,272	0	0	0	169,187,272
TN	0	0	427,809	0	427,809
TX	42,406	0	0	0	42,406
VA	145,432,456	0	0	0	145,432,456
<b>Total</b>	<b>1,718,354,319</b>	<b>17,672,984</b>	<b>60,397,314</b>	<b>788,486,580</b>	<b>2,584,911,197</b>

## Share Of Deposits at Branches In New York



## SECTION IV: IMPACT ON INSURANCE ACTIVITIES

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

For calendar year 2022, a total of 18 New York state-chartered banking institutions reported income from insurance activities, four less than in 2021. As indicated in previous Wild Card Reports, the dollar level of income realized from these activities tends to be modest for both large and small institutions, but for certain institutions, it represented a significant portion of total non-interest income.

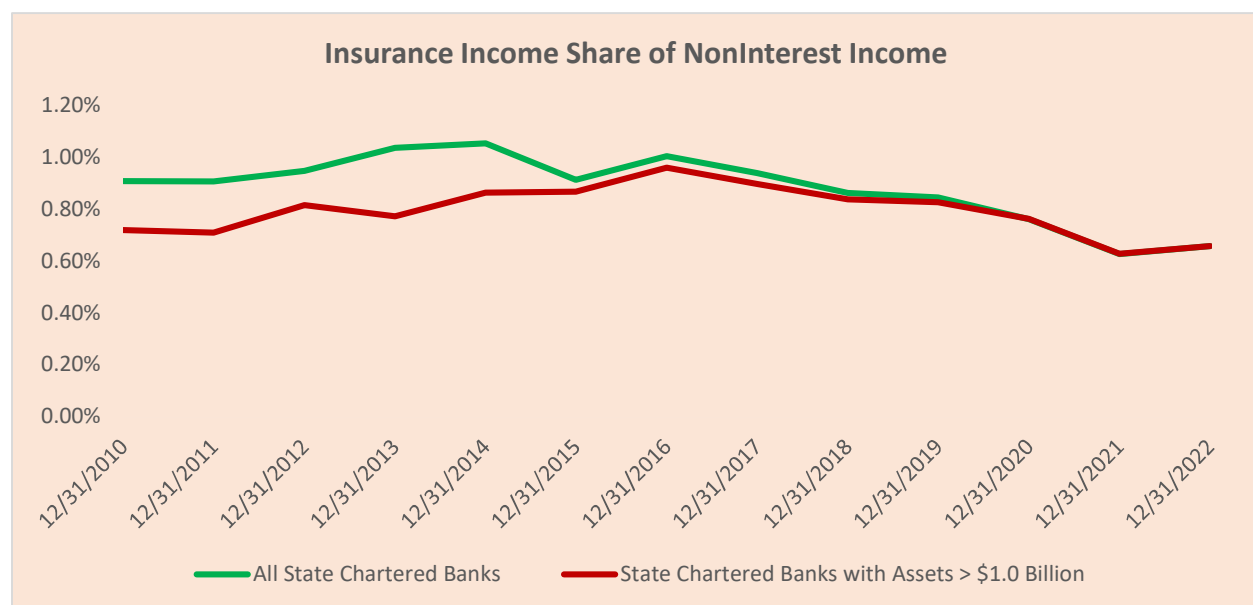
Between 2010 and 2021, income from insurance activities share of aggregate non-interest income ranged from a high of 1.05% in 2014 to a low of 0.63% in 2021. In 2022, income from insurance activities share of such non-interest income rose slightly to 0.66%.

From 2010 to 2021, for those banks with assets less than \$1 billion, income from insurance activities share of non-interest income ranged from a high of 9.38% in 2011 to a low of 0.39% in 2021. In 2022, income from insurance activities share of non-interest income for these banks rose to 0.79%.

For banks with assets greater than \$1 billion, the share ranged from a high of 0.96% in 2016 to a low of 0.63% in 2021. In 2022, income from insurance activities share of non-interest income rose slightly to 0.66%.

### Insurance Income as a Percentage of Noninterest income

The graph below shows insurance income share of noninterest income for the period 12/31/2010 to 12/31/2022.



## Insurance Income Share of Noninterest Income

Table 1 below shows New York state-chartered banks' noninterest and insurance income for 2010 to 2022.

All State Chartered Banks			
Year	Total Noninterest Income	Insurance Commission Fees and Income	Insurance Income Share of Noninterest Income
2010	12,814,649	116,343	0.91%
2011	13,540,872	122,672	0.91%
2012	13,183,905	124,920	0.95%
2013	13,347,829	138,226	1.04%
2014	13,486,393	142,062	1.05%
2015	12,755,261	116,385	0.91%
2016	12,437,378	124,878	1.00%
2017	12,598,486	118,218	0.94%
2018	13,677,616	117,897	0.86%
2019	13,598,102	114,785	0.84%
2020	14,496,238	110,212	0.76%
2021	17,768,054	111,464	0.63%
2022	18,209,741	119,785	0.66%

## State-Chartered Banks with Insurance Income Share

Table 2 below provides the number of New York state-chartered banks within each range of insurance income as a percentage of non-interest income.

Insurance Income Share of Noninterest Income	Total	Total	Less Than \$1 Billion in Assets		Greater Than \$1 Billion in Assets	
	2022	2021	2022	2021	2022	2021
0.00%	46	49	24	27	22	22
.01% to 5.00%	9	14	3	4	6	10
5.01% to 10.00%	3	2	1	1	2	1
10.01% to 15.00%	0	0	0	0	0	0
15.01% to 20.00%	3	4	0	0	3	4
20.01% to 40.00%	2	1	0	0	2	1
40.01% or more	1	1	0	0	1	1
N/A	4	2	4	2	0	0
<b>Total</b>	<b>68</b>	<b>73</b>	<b>32</b>	<b>34</b>	<b>36</b>	<b>39</b>
Limited Purpose Trust Companies, Foreign Branches (with FDIC), Foreign Branches (not with FDIC), Foreign Agencies, Private Bankers and Credit Unions do not report insurance revenue.						

## Total Insurance Income for Each Percent Range

Table 3 below provides the total income from insurance activities of New York state-chartered banks within each range of insurance income as a percentage of non-interest income (\$000).

Insurance Income Share of Noninterest Income	Total		Less Than US \$1 Billion in Assets		Greater Than US \$1 Billion in Assets	
	2022	2021	2022	2021	2022	2021
0.00%	0	0	0	0	0	0
.01% to 5.00%	78,901	77,615	11	54	78,890	77,561
5.01% to 10.00%	6,953	2,425	432	330	6,521	2,095
10.01% to 15.00%	0	0	0	0	0	0
15.01% to 20.00%	9,061	11,053	0	0	9,061	11,053
20.01% to 40.00%	7,649	4,386	0	0	7,649	4,386
40.01% or more	17,221	15,985	0	0	17,221	15,985
N/A	0	0	0	0	0	0
<b>Total for Reporting Institutions</b>	<b>119,785</b>	<b>111,464</b>	<b>443</b>	<b>384</b>	<b>119,342</b>	<b>111,080</b>

## SECTION V: NEW YORK STATE-CHARTERED BANKING ORGANIZATIONS

### Savings Banks

Savings Banks
Apple Bank for Savings
Cross County Savings Bank
Emigrant Bank
First Central Savings Bank
Fulton Savings Bank
NorthEast Community Bank
Pioneer Bank
Rhinebeck Bank
Ridgewood Savings Bank
Rondout Savings Bank
Sawyer Savings Bank
The North Country Savings Bank
Ulster Savings Bank
Watertown Savings Bank
<b>Total: 14</b>

## Savings & Loan Associations


## Commercial Banks, Trust Companies and Private Bankers

Commercial Banks, Trust Companies and Private Bankers
Adirondack Bank
Alden State Bank
Alma Bank
Alpine Capital Bank
Amalgamated Bank
Amerasia Bank
American Community Bank
American Stock Transfer & Trust Company, LLC
Bakkt Trust Company LLC
Bank of Cattaraugus
Bank of Holland
Bank of Millbrook
Bank of Richmondville
Bank of Utica
BitGo New York Trust Company, LLC
Brown Brothers Harriman & Co.
Brown Brothers Harriman Institutional Trust Company of New York, LLC
Catskill Hudson Bank
Cattaraugus County Bank
Chemung Canal Trust Company
Coinbase Custody Trust Company, LLC
Continental Stock Transfer & Trust Company
Depository Trust Company, The
Deutsche Bank Trust Company Americas
Dime Community Bank
Emigrant Mercantile Bank
Empire State Bank
Equiniti Trust Company
ESL Trust Services LLC
Fidelity Digital Asset Services, LLC
Fiduciary Trust Company International
Five Star Bank
Flushing Bank



Gemini Trust Company, LLC
Generations Commercial Bank
Genesee Regional Bank
Global Bank
GMO-Z.com Trust Company, Inc.
Goldman Sachs Bank USA
Greene County Commercial Bank
GS&L Municipal Bank
Habib American Bank
Hanover Community Bank
Interaudi Bank
Israel Discount Bank of New York
Jeff Bank
Manufacturers and Traders Trust Company (M&T Bank)
Metropolitan Commercial Bank
Mizuho Bank (USA)
NYDIG Trust Company LLC
New York Life Trust Company
NewBank
Orange Bank & Trust Company
Pathfinder Bank
Paxos Trust Company, LLC
PCSB Bank
Piermont Bank
Pioneer Commercial Bank
Popular Bank
Shinhan Bank America
Signature Bank
Solvay Bank
Spring Bank
Standard Custody and Trust Company, LLC
The Adirondack Trust Company
The Bank of New York Mellon
The Berkshire Bank
Tompkins Community Bank
United Orient Bank
Woori America Bank
WSB Municipal Bank
<b>Total: 71</b>

## Credit Unions

Credit Unions
AmeriCU Credit Union
Branch 6000 NALC Credit Union
One Credit Union of New York
CFCU Community Credit Union
Directors Choice Credit Union
Erie County Employees Credit Union
Heritage Financial Credit Union
Hudson River Community Credit Union
Hudson Valley Credit Union
Municipal Credit Union
Newspaper Employees Credit Union
Niagara Frontier Federal Municipal Employees Credit Union
Northern Credit Union
Sunmark Credit Union
Yonkers Postal Employees Credit Union
<b>Total: 15</b>

## Foreign Bank Branches

Foreign Bank Branches
Agricultural Bank of China Limited
Allied Irish Banks, PLC
Banco Bilbao Vizcaya Argentaria, S.A.
Banco de La Nacion Argentina
Banco do Brasil, S.A.
Banco Popular de Puerto Rico
Banco Santander, S.A.
Bank Hapoalim B.M. [Insured Branch]
Bank Hapoalim B.M. [Uninsured Branch – Plaza]
Bank of Baroda
Bank of India
Bank of Montreal
Bank of Taiwan
Barclays Bank PLC
BNP Paribas
BNP Paribas Fortis
Canadian Imperial Bank of Commerce
Canara Bank

Chang Hwa Commercial Bank, Ltd.
Chiba Bank, Ltd., The
China Construction Bank Corporation
China Merchants Bank Co., Ltd
Commerzbank Aktiengesellschaft
Cooperatieve Rabobank U.A.
Credit Agricole Corporate and Investment Bank
Credit Industriel et Commercial
Credit Suisse AG
CTBC Bank Co Ltd.
Deutsche Bank AG
DNB Bank ASA
DZ Bank AG Deutsche Zentral-Genossenschaftsbank
First Commercial Bank, Ltd.
Gunma Bank, Ltd., The
Industrial and Commercial Bank of China Limited
Industrial Bank of Korea
Intesa Sanpaolo S.p.A.
KBC Bank N.V.
Kookmin Bank
Korea Development Bank., The
Land Bank of Taiwan Co., Ltd
Landesbank Baden - Wurttemberg
Landesbank Hessen - Thuringen Girozentrale
Lloyds Bank Corporate Markets PLC
Malayan Banking Berhad
Mashreqbank PSC
Mega International Commercial Bank Co., Ltd.
Mizuho Bank, Ltd.,
National Bank of Canada
National Bank of Egypt
National Bank of Pakistan
Natixis
NongHyup Bank
Norddeutsche Landesbank Girozentrale
Nordea Bank ABP
Norinchukin Bank, The
Philippine National Bank
Shinhan Bank
Shizuoka Bank, Ltd., The
Skandinaviska Enskilda Banken
Société Générale
Standard Chartered Bank

State Bank of India
Sumitomo Mitsui Banking Corporation
Sumitomo Mitsui Trust Bank Limited
Svenska Handelsbanken AB
Swedbank AB
Taiwan Business Bank,Ltd.
Taiwan Cooperative Bank, Ltd.
The Shoko Chukin Bank, Ltd.
Turkiye Vakiflar Bankasi T.A.O.
UniCredit Bank AG
UniCredit S.p.A.
<b>Total: 72</b>

### Foreign Agencies

Foreign Agencies
Banco de Bogota
Banco Latinoamericano de Comercio Exterior, S.A.
Bank of Nova Scotia, The
Hua Nan Commercial Bank, Ltd.
KEB Hana Bank
Oversea-Chinese Banking Corporation Limited
P.T. Bank Negara Indonesia (Persero) TBK
P.T. Bank Rakyat Indonesia (Persero)
United Overseas Bank Limited
Woori Bank
<b>Total: 10</b>

## SECTION VI: WILD CARD AUTHORIZATIONS APPROVED IN 2022

Two Wild Card requests were received in 2022, and one Wild Card authorization was issued by the Superintendent. The other request was still being processed at the end of 2022 and was subsequently approved in January 2023.

- The following Wild Card authorization was adopted in 2022:

Wild Card relief to allow Goldman Sachs Bank USA (the Bank) to exempt extensions of credit from the Bank to its affiliates from the legal lending limits under Section 103 of the New York Banking Law, consistent with the exemption from the legal lending limits that applies to extensions of credit by national banks to their affiliates under 12 USC 84 and 12 CFR Part 32, provided, however, that any such extensions of credit by the Bank to its affiliates are conducted in full compliance with the requirements and restrictions set forth in Section 23A and 23B of the Federal Reserve Act and Regulation W of the Federal Reserve Board.