



NEW YORK STATE  
DEPARTMENT *of*  
FINANCIAL SERVICES

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Andrew M. Cuomo  
Governor

Benjamin M. Lawsky  
Superintendent

June 1, 2013

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

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

The Honorable Andrea Stewart-Cousins  
Democratic Conference Leader  
New York State Senate  
Albany, NY 12247

The Honorable Brian Kolb  
Minority Leader  
New York State Assembly  
Albany, NY 12248

The Honorable Jeff Klein  
Temporary President  
New York State Senate  
Albany, NY 12247

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

Dear Sirs:

Enclosed is the 2013 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, is intended to maintain and enhance the appeal of the New York State banking charter. It authorizes the Superintendent of Financial Services to permit state-chartered banking organizations to exercise powers that are available to the corresponding federally-chartered institutions, but not expressly authorized by the Banking Law.

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

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

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

Sincerely,

Benjamin M. Lawsky  
Superintendent of Financial Services

cc: Lawrence Schwartz, Secretary to the Governor  
Mylan Denerstein, Counsel to the Governor  
Senator Joseph Griffo, Chair, Senate Banks Committee  
Senator Hugh T. Farley, Vice-Chair, Senate Banking Committee  
Senator Ted O'Brien, Ranking Member, Senate Banking Committee  
Assemblywoman Annette M. Robinson, Chair, Assembly Banks Committee  
Claudia Tenney, Ranking Member, Assembly Banking Committee



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

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

June 1, 2013

## **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, in the case of non-U.S. banks. The choice of a federal or state charter depends on many factors, including the scope of authorized banking powers, the cost of regulation, whether applicable laws (including consumer protection laws) are deemed to be reasonable, and whether the banking regulator is perceived to be reasonable and flexible. Of all these factors, one of the most important is the scope of authorized banking powers.

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

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

No new Wild Card authorizations were approved during 2012. Section 12-a is currently scheduled to sunset on September 10, 2014.

## ASSESSING CHARTER ACTIONS

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### **Banks and Trust Companies**

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

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

Riegle-Neal made it possible to conduct interstate business through a single entity with a unified management structure. However, before New York State's adoption of its Wild Card statute in 1997, any state-chartered bank making chartering decisions also knew that New York had no means, absent legislative action, to expeditiously conform State banking powers with powers that might be newly granted by federal bank regulators. Industry comment at the time indicated that certain large regional banks did switch charters to facilitate their interstate banking operations.

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

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

We note that Jeff Bank (before conversion, The First National Bank of Jeffersonville) converted from a federal charter to a state charter, effective December 21, 2012. On the other hand, State Bank of Long Island and Gotham Bank of New York merged into federally chartered banks, effective January 1, 2012 and August 10, 2012, respectively.

## **Thrift Institutions**

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

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

In addition, a number of other, similar conversions occurred during 2012: Cross County Savings Bank converted from a federal charter to a state charter, effective March 22, 2012; The Dime Savings Bank of Williamsburgh converted from a federal charter to a state charter, effective June 29, 2012; CMS Bank converted from a federal charter to a state charter, effective June 29, 2012; Fairport Savings Bank converted from a federal charter to a state charter, effective June 29, 2012; Northeast Community Bank converted from a federal charter to a state charter, effective June 29, 2012.

There were 23 state thrifts at the end of 2012, one more than the number at the end of 2011. This was due to a consolidation of Emigrant Savings Bank from five individual banks to one bank and the conversion from federal charter to state charter of the five banks listed in the paragraph above.

## **Credit Unions**

Although credit unions did not become entitled to the benefits of the Wild Card Statute until 2007, they have long experienced the same charter decisions as banks and thrifts. At year-end 1996, New York had 24 state-chartered credit unions and 65 federally-chartered credit unions. At year-end 2012, there were 20 state-chartered credit unions with approximately \$6.6 billion of assets and 392 federally-chartered credit unions with about \$55.8 billion of assets.

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

## **Foreign Branches and Agencies**

In contrast, branches and agencies of foreign banks have found New York an attractive place to be licensed, despite the existence of a federal licensing option. At year-end 1996, there were 49 such State-licensed branches and agencies in New York with total assets of \$43.0 billion. As of year-end 2012, there were 103 such State-licensed bank branches and agencies in New York with total assets of over \$1.6 trillion and 26 federally-licensed bank branches and agencies with \$216.6 billion in total assets. Since few foreign banks engage in retail activities in the U.S., they are attracted to New York because of its status as a global capital market. Nevertheless, while New York still boasts 88 percent of

all financial assets of foreign bank branches and agencies in the U.S., it must continue to make its regulatory scheme attractive to foreign banks in order to maintain its position as a global leader in the financial markets.

**This Report is divided into the following Sections:**

Section I: Listing of state-chartered banking institutions (including banks, thrifts, credit unions and foreign bank branches/agencies) that have been retained, established or converted to federally-chartered banking institutions or have been acquired by or merged with another banking institution, during the year ended December 31, 2012

- Section II: Total employment of the banking sector in this state
- Section III: Total number of chartered banking institutions located in this state, including branches, and the total amount of deposits of such chartered or licensed banking institutions by type of federal, state or out-of-state state charter
- Section IV: Assessment of the impact of the provisions of section 12-a that apply to the insurance activities of state- chartered banking institutions
- Appendix I: Comparison of New York State-Chartered Banking Organizations on December 31, 2011 and December 31, 2012
- Appendix II: Summary and Text of “Wild Card” Authorizations Adopted from January 1, 2012 to December 31, 2012

**SECTION I**

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Listing of New York State-chartered banking institutions that have been retained, established or converted to federally-chartered banking institutions, or have been acquired by or merged with another banking institution during the year ended December 31, 2012.

This section of the Report contains a chronological summary of all actions that affected the charter status of New York State-chartered banks, trust companies and thrift institutions occurring from January 1, 2012 through December 31, 2012. (The reported charter actions for the stated time period are determined by the date the affected institutions commenced or ceased operations, as the case may be, pursuant to the applicable charter action.)

**Savings Banks and Savings and Loan Associations State Charter Activity in 2012**

- Cross County Savings Bank converted from a federal charter to a state charter, effective March 22, 2012.
- The Dime Savings Bank of Williamsburgh converted from a federal charter to a state charter, effective June 29, 2012.
- CMS Bank converted from a federal charter to a state charter, effective June 29, 2012.
- Fairport Savings Bank converted from a federal charter to a state charter, effective June 29, 2012.
- Northeast Community Bank converted from a federal charter to a state charter, effective June 29, 2012.

There were 22 state-chartered savings banks at December 31, 2012, one more than the number at December 31, 2011. As to state-chartered savings and loan associations, the number remained unchanged at one, over the same period. A full list of institutions at year-end 2012 is contained in Appendix I.

## **Commercial Bank and Trust Company Charter Activity in 2012**

- State Bank of Long Island merged into a federally-chartered institution (effective January 1, 2012)
- Bank of Tokyo - Mitsubishi UFJ Trust Company merged into a non-bank institution (effective April 26, 2012)
- Gotham Bank of New York merged into a federally-chartered institution (effective August 10, 2012)
- Jeff Bank converted to a state charter (effective December 21, 2012)

There were 84 state-chartered commercial banks and trust companies at December 31, 2012, two fewer than at December 31, 2011. A full list of institutions is contained in Appendix I.

## **Credit Union Charter Activity in 2012**

There were 20 state-chartered credit unions at December 31, 2012, the same number at December 31, 2011. A full list of institutions is contained in Appendix I.

## **Foreign Bank Branch and Agency Activity in 2012**

- Agricultural Bank of China Limited established a new state-licensed branch
- WestLB AG changed its name to Portigon AG (effective July 2, 2012).
- Eurohypo Aktiengesellschaft changed its name to Hypothekenbank Frankfurt AG.
- Banco Espanol de Credito, S.A. closed its state-licensed branch

There were 103 state-licensed foreign branches and agencies at December 31, 2012, one more than at December 31, 2011. A full list of institutions is contained in Appendix I.

## **SECTION II**

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### **Total employment of the banking sector in the State**

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

## **SECTION III**

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Total number of chartered banking institutions located in New York, including branches, and the total amount of deposits, by type of charter.



**Number of Banks with Offices in New York  
at June 30, 2012<sup>1</sup> by Type of Charter and State of Headquarters**

State of Headquarters	Federally-Chartered Commercial Banks and Trusts	Federally-Chartered Thrifts	Non-NY State-Chartered	NY State-Chartered	Total
CA	2	-	6	-	8
CT	3	1	1	-	5
DE	4	-	-	-	4
FL	1	1	-	-	2
IL	-	-	2	-	2
MA	-	1	1	-	2
NC	1	-	-	-	1
NJ	3	1	4	-	8
NV	-	-	1	-	1
NY	46	32	-	98	176
OH	2	-	-	-	2
PA	1	-	6	-	7
PR	-	-	1	-	1
RI	1	-	-	-	1
SD	2	-	-	-	2
TX	1	-	2	-	3
VA	2	1	-	-	3
<b>Total HQ</b>	<b>69</b>	<b>37</b>	<b>24</b>	<b>98</b>	<b>228</b>

**Number of Offices (Branches) Represented  
in New York at June 30, 2012<sup>2</sup> by State of Bank Headquarters**

State of Headquarters	Federally-Chartered Commercial Banks and Trusts	Federally-Chartered Thrifts	Non-NY State-Chartered	NY State-Chartered	Total
CA	3	-	34	-	37
CT	40	96	2	-	138
DE	292	-	-	-	292
FL	1	1	-	-	2
IL	-	-	2	-	2

<sup>1</sup> This date is used to be consistent with the deposit data which is available from the FDIC at June 30 only

<sup>2</sup> Ibid

State of Headquarters	Federally-Chartered Commercial Banks and Trusts	Federally-Chartered Thrifts	Non-NY State-Chartered	NY State-Chartered	Total
MA	-	1	23	-	24
NC	369	-	-	-	369
NJ	50	29	14	-	93
NV	-	-	1	-	1
NY	841	356	-	1,146	2,343
OH	1,037	-	-	-	1,037
PA	5	-	27	-	32
PR	-	-	3	-	3
RI	160	-	-	-	160
SD	355	-	-	-	355
TX	24	-	2	-	26
VA	515	4	-	-	519
<b>Total</b>	<b>3,692</b>	<b>487</b>	<b>108</b>	<b>1,146</b>	<b>5,433</b>

**Deposits of Branches in New York (Dollars in Thousands) at June 30, 2012<sup>3</sup> by State of Bank Headquarters**

State of Headquarters	Federally-Chartered Commercial Banks and Trusts	Federally-Chartered Thrifts	Non-NY State-Chartered	NY State-Chartered	Total
CA	1,422,673	-	6,046,990	-	7,469,663
CT	2,666,199	2,514,714	81,682	-	5,262,595
DE	30,731,878	-	-	-	30,731,878
FL	247,287	52,015	-	-	299,302
IL	-	-	322,165	-	322,165
MA	-	22,367	943,261	-	965,628
NC	60,668,440	-	-	-	60,668,440
NJ	2,985,602	3,724,554	729,897	-	7,440,053
NV	-	-	46	-	46
NY	60,774,776	26,926,690	-	230,617,293	318,318,759
OH	409,683,280	-	-	-	409,683,280
PA	3,774,186	-	1,044,141	-	4,818,327

<sup>3</sup> Branch deposit data is available from the FDIC at June 30 only

State of Headquarters	Federally-Chartered Commercial Banks and Trusts	Federally-Chartered Thrifts	Non-NY State-Chartered	NY State-Chartered	Total
PR	-	-	1,176,276	-	1,176,276
RI	7,063,872	-	-	-	7,063,872
SD	87,638,123	-	-	-	87,638,123
TX	12,700	-	17,831	-	30,531
VA	101,476,429	-	-	-	101,476,429
<b>Total</b>	<b>769,145,445</b>	<b>33,240,340</b>	<b>10,362,289</b>	<b>230,617,293</b>	<b>1,043,365,367</b>

For information regarding the total amount of assets of New York chartered banking institutions by type, see the [Annual Report of the Department of Financial Services to the Governor](#).

## SECTION IV

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

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

For the calendar year 2012, a total of 25 New York State-chartered banking institutions reported income from insurance activities. As indicated in previous Wild Card Reports, the dollar level of income realized from these activities tends to be modest for both large and small institutions, but for certain institutions, it represented a large portion of total non-interest income. The table below provides a summary of insurance income for New York state-chartered banking institutions.

### Number of State-Chartered Commercial Banks, Trust Companies & Saving Banks In Each Range of Insurance Income as a Percentage of Noninterest Income

Insurance Income Share of Noninterest Income	Total		Less Than US \$1 Billion in Assets		Greater Than US \$1 Billion in Assets	
	2011	2012	2011	2012	2011	2012
0%	71	69	55	55	16	14
.01% to 5.00%	15	16	11	10	4	6
5.01% to 10.00%	4	4	2	3	2	1
10.01% to 15.00%	1	1	0	0	1	1
15.01% to 20.00%	0	0	0	0	0	0
20.01% to 40.00%	0	1	0	1	0	0
40.01% or more	3	3	3	2	0	1
<b>Total</b>	<b>94</b>	<b>94</b>	<b>71</b>	<b>71</b>	<b>23</b>	<b>23</b>

The following types of institutions are not included in the Table above because they do not report insurance revenue:

	2011	2012
Limited Purpose Trust Companies	12	12
Savings and Loans*	1	0
Foreign Branches With FDIC	6	4
Foreign Branches No FDIC	79	84
Foreign Agencies	16	15
Private Bankers	1	1
Credit Unions	20	20
<b>Total Institutions</b>	<b>229</b>	<b>230</b>

\*Began reporting insurance revenue in 2012

## APPENDIX I

### New York State-Chartered Banking Organizations December 31, 2011 and December 31, 2012

Savings Banks		
December 31, 2011	December 31, 2012	Comment
Apple Bank for Savings	Apple Bank for Savings	
	CMS Bank	Converted to a State Charter
	Cross County Savings Bank	Converted to a State Charter
Elmira Savings Bank	Elmira Savings Bank	
Emigrant Bank	Emigrant Bank	
Emigrant Savings Bank - Bronx/Westchester		Consolidated into one bank
Emigrant Savings Bank - Brooklyn/Queens		
Emigrant Savings Bank - Long Island		
Emigrant Savings Bank - Manhattan		
	Fairport Savings Bank	Converted to a State Charter
First Central Savings Bank	First Central Savings Bank	
Fulton Savings Bank	Fulton Savings Bank	
New York Community Bank	New York Community Bank	
	NorthEast Community Bank	Converted to a State Charter
PathFinder Bank	PathFinder Bank	
Pioneer Savings Bank	Pioneer Savings Bank	
Putnam County Savings Bank	Putnam County Savings Bank	
Rhinebeck Savings Bank	Rhinebeck Bank	
Ridgewood Savings Bank	Ridgewood Savings Bank	
Rondout Savings Bank	Rondout Savings Bank	
Sawyer Savings Bank	Sawyer Savings Bank	
	The Dime Savings Bank of Williamsburgh	Converted to a State Charter
The North Country Savings Bank	The North Country Savings Bank	
The Oneida Savings Bank	The Oneida Savings Bank	
Ulster Savings Bank	Ulster Savings Bank	
Watertown Savings Bank	Watertown Savings Bank	

<b>Savings Banks</b>		
<b>December 31, 2011</b>	<b>December 31, 2012</b>	<b>Comment</b>
<b>Total: 21</b>	<b>Total: 22</b>	

<b>Savings &amp; Loan Associations</b>	
<b>December 31, 2011</b>	<b>December 31, 2012</b>
Medina Savings and Loan Association	Medina Savings and Loan Association
<b>Total: 1</b>	<b>Total: 1</b>

<b>Commercial Banks, Trust Companies and Private Bankers</b>		
<b>December 31, 2011</b>	<b>December 31, 2012</b>	<b>Comment</b>
Adirondack Bank	Adirondack Bank	
Alden State Bank	Alden State Bank	
Alma Bank	Alma Bank	
Alpine Capital Bank	Alpine Capital Bank	
Amalgamated Bank	Amalgamated Bank	
Amerasia Bank	Amerasia Bank	
American Community Bank	American Community Bank	
American Stock Transfer & Trust Company, LLC	American Stock Transfer & Trust Company, LLC	
Anthos Trust Company, LLC	Anthos Trust Company, LLC	
Banco Popular North America	Banco Popular North America	
Bank Leumi USA	Bank Leumi USA	
Bank of Akron	Bank of Akron	
Bank of Cattaraugus	Bank of Cattaraugus	
Bank of Holland	Bank of Holland	
Bank of Millbrook	Bank of Millbrook	
Bank of Richmondville	Bank of Richmondville	
Bank of Tokyo – Mitsubishi UFJ Trust Company		Merged into nonbank institution
Bank of Utica	Bank of Utica	
Berkshire Bank Municipal Bank	Berkshire Bank Municipal Bank	
BPD Bank	BPD Bank	
Brown Brothers Harriman & Co.	Brown Brothers Harriman & Co.	
Catskill Hudson Bank	Catskill Hudson Bank	
Cattaraugus County Bank	Cattaraugus County Bank	
CheckSpring Bank	Spring Bank	Name Change
Chemung Canal Trust Company	Chemung Canal Trust Company	
Citizens Bank of Cape Vincent	Citizens Bank of Cape Vincent	
Continental Stock Transfer & Trust Company	Continental Stock Transfer & Trust Company	

<b>Commercial Banks, Trust Companies and Private Bankers</b>		
<b>December 31, 2011</b>	<b>December 31, 2012</b>	<b>Comment</b>
Country Bank	Country Bank	
Deutsche Bank Trust Company Americas	Deutsche Bank Trust Company Americas	
Emigrant Mercantile Bank	Emigrant Mercantile Bank	
Empire State Bank	Empire State Bank	
Fiduciary Trust Company International	Fiduciary Trust Company International	
First American International Bank	First American International Bank	
Five Star Bank	Five Star Bank	
Flushing Commercial Bank	Flushing Commercial Bank	
Genesee Regional Bank	Genesee Regional Bank	
Genesee Valley Trust Company	Genesee Valley Trust Company	
Global Bank	Global Bank	
Gold Coast Bank	Gold Coast Bank	
Goldman Sachs Bank USA	Goldman Sachs Bank USA	
Gotham Bank of New York		Merged into Federal Charter
Greene County Commercial Bank	Greene County Commercial Bank	
Habib American Bank	Habib American Bank	
Hanover Community Bank	Hanover Community Bank	
Interaudi Bank	Interaudi Bank	
Israel Discount Bank of New York	Israel Discount Bank of New York	
	Jeff Bank	Converted to State Charter
Law Debenture Trust Company of New York	Law Debenture Trust Company of New York	
Manufacturers and Traders Trust Company	Manufacturers and Traders Trust Company	
Market Street Trust Company	Market Street Trust Company	
Mitsubishi UFJ Trust & Banking Corporation (U.S.A.)	Mitsubishi UFJ Trust & Banking Corporation (U.S.A.)	
Mizuho Corporate Bank (USA)	Mizuho Corporate Bank (USA)	
Mizuho Trust & Banking Co. USA	Mizuho Trust & Banking Co. USA	
New York Commercial Bank	New York Commercial Bank	
New York Life Trust Company	New York Life Trust Company	
NewBank	NewBank	
OFI Trust Company	OFI Trust Company	
Orange County Trust Company	Orange County Trust Company	
Pathfinder Commercial Bank	Pathfinder Commercial Bank	
PCSB Commercial Bank	PCSB Commercial Bank	
Pioneer Commercial Bank	Pioneer Commercial Bank	
Provident Municipal Bank	Provident Municipal Bank	
Riverside Bank	Riverside Bank	
Savoy Bank	Savoy Bank	
Shinhan Bank America	Shinhan Bank America	

<b>Commercial Banks, Trust Companies and Private Bankers</b>		
<b>December 31, 2011</b>	<b>December 31, 2012</b>	<b>Comment</b>
Signature Bank	Signature Bank	
Solvay Bank	Solvay Bank	
State Bank of Chittenango	State Bank of Chittenango	
State Bank of Long Island		Merged into Federal Charter
Steuben Trust Company	Steuben Trust Company	
The Adirondack Trust Company	The Adirondack Trust Company	
The Bank of Castile	The Bank of Castile	
The Bank of New York Mellon	The Bank of New York Mellon	
The Bank of Nova Scotia Trust Company of New York	The Bank of Nova Scotia Trust Company of New York	
The Berkshire Bank	The Berkshire Bank	
The Depository Trust Company	The Depository Trust Company	
The Northern Trust Company of New York	The Northern Trust Company of New York	
The Warehouse Trust Company LLC	The Warehouse Trust Company LLC	
The Westchester Bank	The Westchester Bank	
Tioga State Bank	Tioga State Bank	
Tompkins Trust Company	Tompkins Trust Company	
United International Bank	United International Bank	
United Orient Bank	United Orient Bank	
USNY Bank	USNY Bank	
Victory State Bank	Victory State Bank	
Woori America Bank	Woori America Bank	
WSB Municipal Bank	WSB Municipal Bank	
Total: 86	Total: 84	

<b>Credit Unions</b>	
<b>December 31, 2011</b>	<b>December 31, 2012</b>
AmeriCU Credit Union	AmeriCU Credit Union
Branch 6000 NALC Credit Union	Branch 6000 NALC Credit Union
Buffalo Service Credit Union	Buffalo Service Credit Union
CFCU Community Credit Union	CFCU Community Credit Union
Directors Choice Credit Union	Directors Choice Credit Union
Empire Branch 36 National Association of Letter Carriers Credit Union	Empire Branch 36 National Association of Letter Carriers Credit Union
Empire State Credit Union	Empire State Credit Union
Encompass Niagara Credit Union	Encompass Niagara Credit Union
Erie County Employees Credit Union	Erie County Employees Credit Union
Hudson River Community Credit Union	Hudson River Community Credit Union
Jamestown Post Office Employees' Credit Union	Jamestown Post Office Employees' Credit Union
Melrose Credit Union	Melrose Credit Union

Montauk Credit Union	Montauk Credit Union
Municipal Credit Union	Municipal Credit Union
Newspaper Employees Credit Union	Newspaper Employees Credit Union
Niagara Falls Penn Central Employees Credit Union	Niagara Falls Penn Central Employees Credit Union
Norton-Troy Employees Credit Union	Norton-Troy Employees Credit Union
Progressive Credit Union	Progressive Credit Union
The Niagara Frontier Federal Employees Credit Union	The Niagara Frontier Federal Employees Credit Union
Yonkers Postal Employees Credit Union	Yonkers Postal Employees Credit Union
Total: 20	Total: 20

Foreign Bank Branches		
December 31, 2011	December 31, 2012	Comment
	Agricultural Bank of China Limited	New License
Allied Irish Banks, p.l.c.	Allied Irish Banks, p.l.c.	
Banca Monte dei Paschi di Siena S.p.A.	Banca Monte dei Paschi di Siena S.p.A.	
Banco Bilbao Vizcaya Argentaria, S.A.	Banco Bilbao Vizcaya Argentaria, S.A.	
Banco de La Nacion Argentina	Banco de La Nacion Argentina	
Banco Del Estado de Chile	Banco Del Estado de Chile	
Banco do Brasil, S.A.	Banco do Brasil, S.A.	
Banco Espanol de Credito, S.A.		Closed
Banco Espirito Santo de Investimento, S.A.	Banco Espirito Santo de Investimento, S.A.	
Banco Espirito Santo, S.A.	Banco Espirito Santo, S.A.	
Banco Popular de Puerto Rico	Banco Popular de Puerto Rico	
Banco Santander, S.A.	Banco Santander, S.A.	
Bank Hapoalim B.M.	Bank Hapoalim B.M.	
Bank of Baroda	Bank of Baroda	
Bank of India	Bank of India	
Bank of Montreal	Bank of Montreal	
Bank of Scotland plc	Bank of Scotland plc	
	Bank of Taiwan	Upgraded from agency
Barclays Bank PLC	Barclays Bank PLC	
BNP Paribas	BNP Paribas	
Caixa Geral de Depositos, S.A.	Caixa Geral de Depositos, S.A.	
Chang Hwa Commercial Bank, Ltd.	Chang Hwa Commercial Bank, Ltd.	
China Construction Bank Corporation	China Construction Bank Corporation	
China Merchants Bank Co., Ltd	China Merchants Bank Co., Ltd	
Chinatrust Commercial Bank, Ltd.	Chinatrust Commercial Bank, Ltd.	
Commerzbank Aktiengesellschaft	Commerzbank Aktiengesellschaft	



<b>Foreign Bank Branches</b>		
<b>December 31, 2011</b>	<b>December 31, 2012</b>	<b>Comment</b>
Cooperatieve Centrale Raiffeisen-Boeren Leenbank B.A., Rabobank Nederland	Cooperatieve Centrale Raiffeisen-Boerenleenbank B.A., Rabobank Nederland	
Credit Agricole Corporate and Investment Bank	Credit Agricole Corporate and Investment Bank	
Credit Industriel et Commercial	Credit Industriel et Commercial	
Credit Suisse AG	Credit Suisse AG	
Depfa Bank plc	Depfa Bank plc	
Deutsche Bank AG	Deutsche Bank AG	
Dexia Credit Local S.A.	Dexia Credit Local	
DnB NOR Bank ASA	DNB Bank ASA	Name Change
DZ Bank AG Deutsche Zentral-Genossenschaftsbank	DZ Bank AG Deutsche Zentral-Genossenschaftsbank	
Eurohypo Aktiengesellschaft	Hypothekenbank Frankfurt AG	Name change
First Commercial Bank, Ltd.	First Commercial Bank, Ltd.	
Fortis Bank S.A./N.V.	Fortis Bank S.A./N.V.	
Habib Bank Limited	Habib Bank Limited	
HSH Nordbank AG	HSH Nordbank AG	
Industrial and Commercial Bank of China Limited	Industrial and Commercial Bank of China Limited	
Industrial Bank of Korea	Industrial Bank of Korea	
Intesa Sanpaolo S.p.A.	Intesa Sanpaolo S.p.A.	
Itau Unibanco S.A.	Itau Unibanco S.A.	
KBC Bank N.V.	KBC Bank N.V.	
Kookmin Bank	Kookmin Bank	
Land Bank of Taiwan Co., Ltd.	Land Bank of Taiwan Co., Ltd.	
Landesbank Baden - Wurttemberg	Landesbank Baden - Wurttemberg	
Landesbank Hessen - Thuringen Girozentrale	Landesbank Hessen - Thuringen Girozentrale	
Lloyds TSB Bank plc	Lloyds TSB Bank plc	
Malayan Banking Berhad	Malayan Banking Berhad	
Mashreq Bank psc	Mashreq Bank psc	
Mega International Commercial Bank Co., Ltd.	Mega International Commercial Bank Co., Ltd.	
Mitsubishi UFJ Trust and Banking Corporation	Mitsubishi UFJ Trust and Banking Corporation	
Mizuho Corporate Bank, Ltd.	Mizuho Corporate Bank, Ltd.	
National Bank of Canada	National Bank of Canada	
National Bank of Egypt	National Bank of Egypt	
National Bank of Pakistan	National Bank of Pakistan	
Natixis	Natixis	
Norddeutsche Landesbank Girozentrale	Norddeutsche Landesbank Girozentrale	

<b>Foreign Bank Branches</b>		
<b>December 31, 2011</b>	<b>December 31, 2012</b>	<b>Comment</b>
Nordea Bank Finland Plc	Nordea Bank Finland Plc	
Nordea Bank Norge ASA	Nordea Bank Norge ASA	
Philippine National Bank	Philippine National Bank	
Shinhan Bank	Shinhan Bank	
Skandinaviska Enskilda Banken	Skandinaviska Enskilda Banken	
Societe Generale	Societe Generale	
Standard Chartered Bank	Standard Chartered Bank	
State Bank of India	State Bank of India	
	State Bank of India Jackson Heights	
Sumitomo Mitsui Banking Corporation	Sumitomo Mitsui Banking Corporation	
Svenska Handelsbanken AB	Svenska Handelsbanken AB	
Swedbank (ForeningsSparbanken AB)	Swedbank AB	
T.C. Ziraat Bankasi	T.C. Ziraat Bankasi	
The Bank of Tokyo - Mitsubishi UFJ, Ltd.	The Bank of Tokyo - Mitsubishi UFJ, Ltd.	
The Chiba Bank, Ltd.	The Chiba Bank, Ltd.	
The Gunma Bank, Ltd.	The Gunma Bank, Ltd.	
The Korea Development Bank	The Korea Development Bank	
The Norinchukin Bank	The Norinchukin Bank	
The Royal Bank of Scotland N.V.	The Royal Bank of Scotland N.V.	
The Royal Bank of Scotland PLC	The Royal Bank of Scotland PLC	
The Shizuoka Bank, Ltd.	The Shizuoka Bank, Ltd.	
The Shoko Chukin Bank	The Shoko Chukin Bank	
The Sumitomo Trust and Banking Company Limited	The Sumitomo Trust and Banking Company Limited	
The Toronto-Dominion Ban	The Toronto-Dominion Bank	
Turkiye Vakiflar Bankasi T.A.O.	Turkiye Vakiflar Bankasi T.A.O.	
UniCredit Bank AG	UniCredit Bank AG	
UniCredit S.p.A.	UniCredit S.p.A.	
United Bank Limited	United Bank Limited	
WestLB AG	Portigon AG	Name change
Total: 86	Total: 88	

<b>Foreign Bank Agencies</b>		
<b>December 31, 2011</b>	<b>December 31, 2012</b>	<b>Comment</b>
Banco de Bogota	Banco de Bogota	
Banco Industrial de Venezuela, C.A.	Banco Industrial de Venezuela, C.A.	
Banco Latinoamericano de Comercio	Banco Latinoamericano de Comercio	

Exterior, S.A.	Exterior, S.A.	
Bank Leumi Le-Israel B.M.	Bank Leumi Le-Israel B.M.	
Bank of Taiwan		Upgraded to Branch
Beogradska Banka dd	Beogradska Banka dd	
Canadian Imperial Bank of Commerce	Canadian Imperial Bank of Commerce	
Hana Bank	Hana Bank	
Hua Nan Commercial Bank, Ltd.	Hua Nan Commercial Bank, Ltd.	
Jugobanka dd	Jugobanka dd	
Oversea-Chinese Banking Corporation Limited	Oversea-Chinese Banking Corporation Limited	
P.T. Bank Negara Indonesia (Persero) Tbk	P.T. Bank Negara Indonesia (Persero) Tbk	
P.T. Bank Rakyat Indonesia (Persero)	P.T. Bank Rakyat Indonesia (Persero)	
The Bank of Nova Scotia	The Bank of Nova Scotia	
United Overseas Bank Limited	United Overseas Bank Limited	
Woori Bank	Woori Bank	
Total: 16	Total: 15	

## Appendix II

There were no “Wild Card” Authorizations Adopted from January 1, 2012 to December 31, 2012.