

# Expedited Business Reorganization Decision

**Applicant Name** \_\_\_\_\_

**CAIS Control No.** \_\_\_\_\_

**Type of Filing**

**Form of Transaction**

- Affiliate Reorganization
- Newly Affiliated Relationship
- Combination with Interim Depository Institution
- Other \_\_\_\_\_

- Merger
- Consolidation
- Purchase and Assumption
- Riegle-Neal (add supplement)

BANK NAMES	ASSETS as of (date)	T1/ TRWA	TC/ TRWA	Leverage Ratio	CAMELS RATING    DATE	CRA RATING    DATE
Resulting						

**Summary:** (Add if needed-- names of any interim bank w/holding company, deposits acquired if purchase and assumption, and whether the Fed waived the HC application.)

The following typically will be answered "yes" or "NA." If answering "no," expand this document to explain or attach supplemental questions as appropriate.

Is the Applicant eligible? Yes  No

Is the Target(s) eligible? Yes  No

Is the filing expedited? Yes  No

Does the application include confirmation of the newspaper publication? Yes  No

Does Supervisory Office agree with recommendation to approve, including having no concern with systems integration? Yes  No

The application contains all the information required by 12 C.F.R. 5.33(e)(1)(i) through (iv).

The following factors were considered and are satisfactory:

- Competition Yes  No  NA
- Financial and managerial resources and future prospects? Yes  No
- Convenience and needs of the community?
  - Will the resulting bank offer the same (or greater) products and services as acquiring and target banks? Yes  No
  - Will any branches be closed as a result of the merger? Yes  No
- Community reinvestment? Yes  No

Is the CRA assessment area unchanged, or if changed, will it be revised appropriately?

Yes  No

Does the application include a representation to retain existing CRA commitments?

Yes  No  NA

The application contained all the information requested in 12 CFR 5.33(e)(2) through (6) and all provisions were addressed satisfactorily.

- Acquisition and retention of branches? Yes  No  NA
- Subsidiaries? Yes  No  NA
- Interim bank? Yes  No  NA
- Nonconforming assets/subsidiaries? Yes  No  NA   
(Explain any conformance or divestiture being granted.)
- Fiduciary powers? Yes  No  NA

If the following answers are "no," no further explanation is required. If "yes," expand this document or attach a supplement to explain as appropriate.

Does the transaction involve a:

- Capital Reduction request? Yes  No  NA
- Bank Premises request? Yes  No  NA
- Novel policy issue? (Attach HQ LIC clearance.) Yes  No  NA
- Legal issue? Yes  No  NA
- Supervisory or compliance concern? Yes  No  NA
- CRA performance concern? (Ref. component rating.) Yes  No  NA
- Minority or dissenting shareholder issue? Yes  No  NA
- Fiduciary powers application? Yes  No  NA

RECOMMENDATION: There were no substantive adverse public or third-party comments received. Based on the information in the file, the criteria set forth above, and the statutory and regulatory factors at 12 USC1828(c) and 12 CFR 5.33, the recommended decision is approval.

Prepared by: \_\_\_\_\_

Date:

DECISION: Based on the analysis of the information in the file and review of the statutory, regulatory, and policy factors, including the commitments and representations made by the banks, the application is approved.

Date:

\_\_\_\_\_  
Name, Title

Attachment(s)(if necessary): Decision Statement  
Riegle-Neal Document  
HQ LIC Policy Issue Clearance or Anticompetitive Review

**RIEGLE-NEAL (R-N) SUPPLEMENT**

1. Does the host state involved with this transaction require the target to be in operation for a minimum number of years before it can be involved in a merger? (If yes, indicate the number of **Years** \_\_\_\_.) Yes  No  NA

If the host state has an age limit, does the proposal satisfy the state age limits or the 5-year minimum, whichever is less, as permitted by 12 U.S.C. 1831u(a)(5)? (If no, explain.)

Yes  No  NA

2. Has the applicant sent a copy of the merger application to each of the banking commissioners of the host states that will result from the merger? (If no, discuss.) Yes  No  NA

3. Has the applicant represented in writing that the proposal meets the filing requirements of the states involved in the R-N merger? (If no, discuss.) Yes  No  NA

4. Deposit Concentration Limits.

- a. Does the transaction comply with the R-N's nationwide and statewide deposit concentration limits? (NOTE: The R-N limits *do not* apply to mergers between affiliated banks. Also the R-N statewide deposit limit applies only when any bank involved in the transaction, including its depository institution affiliates, has a branch in any state in which any other bank involved also has a branch.)

Yes  No

- b. Does any state involved have its own deposit concentration limit that might be applicable to the transaction? Yes  No   
If yes, does the proposed merger comply with it? Yes  No

5. Does the district's legal memorandum indicate that the merger fully complies with the Riegle-Neal Act? Yes  No

6. Was each bank involved in the transaction adequately capitalized on the date the application was filed? Yes  No  NA

7. Will the resulting bank continue to be adequately capitalized and adequately managed upon consummation? Yes  No  NA

8. Does the transaction meet the CRA compliance requirements of Riegle-Neal [12 U.S.C. 1831u(b)(3)]? (This section does not apply if the acquiring institution has a branch or bank affiliate in the new state prior to the merger.)

Yes  No  NA