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FIL-114-2005
November 17, 2005

REPORTING REQUIREMENTS

TO: CHIEF EXECUTIVE OFFICER

SUBJECT: Annual Report on Indebtedness of Executive Officers and
Principal Shareholders to Correspondent Banks (FFIEC 004)

Enclosed is a copy of the Federal Financial Institutions Examination Council (FFIEC) 004 report that may be used to comply with the reporting requirements of Title VIII of the Financial Institutions Regulatory and Interest Rate Control Act of 1978. The Act requires the executive officers and principal shareholders of each bank to submit an annual report to their board of directors on their indebtedness, and that of their related interests, to correspondent banks. Section 306(j) of the Federal Deposit Insurance Corporation Improvement Act of 1991 imposes these same requirements on savings associations. Reports for calendar year 2005 should be submitted to your board of directors by January 31, 2006.

The FFIEC 004 report is designed to assist an institution's executive officers and principal shareholders in complying with the federal banking agencies' regulations implementing these statutory requirements. These regulations are 12 CFR Part 215 for state member banks, 12 CFR Part 349 for insured state nonmember banks, 12 CFR Part 31 for national banks, and 12 CFR 563.43 for savings associations.

The use of the FFIEC 004 report is optional and executive officers and principal shareholders may use any reporting format that provides the required information. Institutions should not forward copies of annual reports to their primary federal banking regulator. However, institutions are required to maintain a copy of all reports on file for a period of three years and must make these reports available for examiner review.

Please inform your executive officers and principal shareholders as soon as possible that they and their related interests are subject to this reporting requirement. You should also provide them with a list of the names and addresses of correspondent banks. Copies of the FFIEC 004 report form and instructions also are available on the FFIEC's Web site (www.ffiec.gov/forms004.htm).

For further information or assistance concerning the FFIEC 004 report, state member banks should contact their Federal Reserve District Bank, insured state nonmember banks should contact their Federal Deposit Insurance Corporation Regional Office, national banks should contact their Office of the Comptroller of the Currency District Office, and savings associations should contact their Office of Thrift Supervision Regional Office.

Tamara J. Wiseman
Executive Secretary

Enclosure

Distribution: State Member Banks, Insured State Nonmember Banks, National Banks, and Savings Associations