MEMORANDUM OF MEETING

FROM: Christopher Hencke

Counsel, Legal Division

SUBJECT: Meeting with American Express

On April 28, 2011, FDIC staff met with representatives of American Express (with some representatives in attendance by telephone). Through this meeting, American Express presented comments on core and brokered deposits in connection with the study mandated by section 1506 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

American Express is affiliated with two banks: American Express Centurion Bank and American Express Bank FSB. The deposits at these banks represent direct customer deposits, CDs placed by third parties, and deposits from third-party sweep programs. At the meeting, the attendees discussed the characteristics and stability of these types of deposits for purposes of supervision and assessments.

<u>Attendees</u>

Name Representing
Juliana O'Reilly American Express

Anderson Lee American Express

Christopher Forno American Express

Kevin Thompson American Express Centurion Bank

William Kroener Sullivan & Cromwell (representing

American Express)

Andrea Moss American Express Centurion Bank

Scott Godderidge American Express Bank FSB

Denise Roberts American Express Bank FSB

Diane Ellis FDIC

Mindy West FDIC

Munsell St. Clair FDIC

Rebecca Berryman FDIC

Joseph DiNuzzo FDIC

Chris Hencke FDIC