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1974

BANKS + BANKING
Maine

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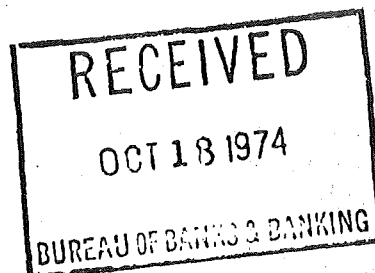
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October 16, 1974

Mr. Ralph H. Gelder
Superintendent
Bureau of Banks and Banking
Department of Business Regulation
State Office Annex
Capitol Shopping Center
Augusta, Maine 04330



Dear Ralph:

Enclosed are our comment pages for the draft statute. These are sent to you in the same form as we made them during the drafting process. Not all sections of the new statute are included, as the derivation notes at the bottom of various sections are self-explanatory in many instances.

Hopefully, your having these sheets will be an aid to your analysis of our work product. However, if you have any questions at all between now and October 29, please call Tim or me so that they can be cleared up.

Tim and I both look forward to hearing from you and Bob as to your own comments and those you may receive from the committee members or their counsel.

If there is anything else you need for the meeting on the 29th, please let me know.

Very truly yours,

A handwritten signature in cursive script that reads "Tom".

Thomas C. Evans

A large, stylized handwritten flourish or mark, possibly a large letter 'C' or a similar symbol.

TCE / ger
Encl.

\$200

(d) to reflect bureau comments

- (a) (1): R.30; removed from recommendation any specific reference to divisions that a deputy superintendent is to deal with, pursuant to reasons set forth in 200 (c) comment; see also §1
- (2) §1 of present law; no change
- (b) (1) R.31; §1 see report p. 38

(a) (1) and (2)

§1 as amended

(2) expanded to permit deposits in any type of financial institution on terms available to the public R.35-stockholder prohibition

(b) R.35;

Alternative I: specifically, by reference to ch. 31 & 32, limits prohibition to State chartered institutions

\$203

1. \$2

travel included pursuant to Bureau comment

1. 6-1; added "not provided for" language

1. R.37; delete present statute §3; 6-4

1. 4;
2. bureau recommended an "annual report to the governor & so, am giving it to them

1. 6-2; R.45

(b) 402-2; may duplicate publication requirement
for income statements etc. pursuant to R.21;

- (a) 6 - 3
- (b) carries reports over to R.45
- (c) 6 - 3

(a) 1042; new as to SB & SL; area where the Bureau felt expansion was necessary

(a) (2) can be used by Bureau as a basis for requiring loans to be set out in specific categories, etc., regulations could delineate portfolio placement

(a) §3; Commissioner added pursuant to Weil request

(a) (4) Report text at 38; new

(b) §3

1. 403; new as to SL

(b) deleted specific reference to old chapter 53,
as (a) makes section apply to all provisions of
the Title

(a) 5-8; FDIC §1818(b) (1) & HOLA 1933 (1464)

for format federal regulatory agency powers used
as a model

(a) (1) (E) R. 38

(b) §7

(c) §7

(d) new

1. R40; 2032-4 derived from 12USC 1818(e)

(FDIC officer removal)

Note: FDIC statute spells out the procedure in statute, not in regulations, R. 40 wants technical provision in regulations.

§7

- (a) taken from old §7; these provisions were deleted in the 1973 amendments, but such protections would appear worthwhile, particularly from a public interest standpoint

§230

+
223

R. 38, no comparable Federal provisions

(a) cross reference to rule making sections

(a) (2) would permit public complaint to the
superintendent regarding particular
acts and practices.

(a) (3) tie in of sections

NOTE: do we want a provision in Ch. 39 making
such acts unlawful?

(a) 5 USC 551 (4); (5)

Time for: comment: 30 days; & hearing: request
3 weeks; hold w/i 30 days of comment period close

(b) final decision 30 days after hearing or close of
comment period

Bureau can protect itself by having a long comment
period

(b) (1) problem with how to give public notice unless
there is a central document like FR

does the state have an official manner of filing
for State issued notices?

publish in such newspapers as superintendent deems
appropriate

R. 42

- (c) still leaves open the question as to what is confidential information
- (f) leeway; comment period can be longer than 30 days
- (f) (2) This provision deviates somewhat from R.42(f) in that it does not require a specific finding of fact for each of the R.44 criteria. This should be avoided, because to require such would result in persons making challenges on a straight numerical bases.
- (g) Allows superintendent to delay action, but sets strict time limits once action is commenced.

- (a) 991; deleted cross references and "applicability" language and statement of powers.
- (b) 992-(1-4); (2) added statement relating to type of institution to be formed to reflect applicability to TC, SB and SL's
 - (3) changed "transact business" to principal office
 - (4) cross reference to minimum capital sections
 - (5) derived from 13-A 403, felt necessary to permit superintendent to review management capabilities under R.44
 - (6) derived from 998; subscribers added to conform with requirements of 301(b)(8)
 - (7) new; to allow superintendent to look into other info for R.44 determination

Paragraph after (8). derived from 998 requirements; cross to revenues and expenses in part 2.
- (c) 993; "type of financial institution to be organized" added
- (d) derived from 993; (2) new; to provide a direct cross-reference to pt. 2 decision making requirements of R.44
 - (3) new; this provides superintendent with regulatory authority for organization which is now lacking
- (e) new in parts
 - (1) new
 - (2) derived from 999
 - (3) standards for determining
- (f) 993

(a) 994

(b) 994 and 995; added articles of incorporation;
added 15 day time period for approval or disapproval;

(c) derived from 996; substantial change to conform
with the requirements of Title 13-A, Chapter 4 present
996 has no relationship to 13-A requirements;

(d) (1) 997

(d) (2): derived from 997; used minimum capital stock
to permit corporation to have authorized shares in
addition to starting capital; present law requires
"whole capital stock".

(e) (1) 997; minimum capital and surplus substituted for
"whole capital stock and surplus".

(e) (2) 997

(f) (1) 1002

(b) 999

(c) 1001; except last full paragraph which is
in chapter 32.

(4) Class voting except in election of directors is
a new provision.

(a) (b) derived from 1041;

(4) 1043; deleted "bank" from holding company
to take into account possibility of SB & SL
holding companies.

(a) 441-1; 1591

(b) 441-2; 1592

added purpose for which formed; and names of directors and so forth, as this would give the superintendent a certain amount of review capability at an early stage

(c) 1592; 441-3; changed newspaper requirement to one of "general circulation" for conformity

(d) (1): new section; necessary because of alteration in order of steps; derived from FHLBB Regulations 12 CFR § 5432

(d) (2) part of 441-4 and 1592 deleted because R.44 will substitute decision criteria; similarly, implementation of R.44 will eliminate need to have any time limits an organization and formation imposed by this section

(e) 441-6; 1593; changed as to amount and the method of computing

(a) new; derived from TC sections

(b) new; purpose to conform with organization of a stock institution and to reflect new order of organizational proceedings set forth in this Title same holds true for (c)

(f) 441-7; 1594

total time period remains the same 1 1/2 years, but order is now 1 year plus the possibility of a six month extension

(a) (1) new; for defining specific term used throughout the section

(a) (2) 1593

(a) (3) 1593

(a) (4) 1593

(a) (5) 1593

(a) (6) 441-6; 1593

- (1) 471-1
- (2) R.20
- (3) 471-3
- (4) 471-3
- (5) 471-2
- (6) R.19

- (b) (1) 1701
- (b) (2) 1709; 1701
- (b) (3) 1794
- (b) (4) 1713

- (c) (1) 471-4; 1791-2 added "any other proper business"
language to what shall be done at SB annual meeting.
- (c) (2) 471-4; 1791-3 president can now call for SL; added
"manners provided in bylaws."
- (c) (3) 471-4; 1791-2,3 extended mailed notice to special
meetings of members
- (c) (4) 1792; at present, there is no quorum requirement
for corporators meetings; this section adds such
- (c) (5) 1793
- (c) 1596

1. 315(a); 472; 1661

(a) (4) 1665; 472-3; deleted 1665 oath form;
removal provision new for SBs

(a) (5) medical expenses new for SL

(b) 472-4; 1661

(c) (3) expands SB executive committee powers;
imposes record keeping duties on SL

(c) (5) 472-8; no similar provision in SL law

(a) 473-1; 1663

1. expands power of SBs in that the bylaws may provide for election by corporators
2. used SB proviso for designation of officers
3. deleted SL provision that Pres. & VP cannot be same person
4. spelled out annual term for SB officers
5. board chairman - Bureau recommendations

(b) 1663; 473-1

(c) 473-1; 1664

(c) (1) 473-6; deleted 473-7 on vice president, as his powers are inherent in the office; section places a new power on the president on a SL

(c) (2): 473-8; new proviso as to SL

(c) (3) 473-5; new provision as to SL; but inherent in office (d) 1665; new as to SB, but in line with oath requirement for directors; deleted printed oath form

(c) (3) 473-5

(f) 473-1

(d) 1665

(e) 473-2;

1666;

1041

1. Generally, the language of 321(a)-(h) has been taken from Title 13-A, §202. This was done to create conformity with the general corporations law and because the 13-A language is perhaps the most recent example of modern statutory provisions for the State.

(a) no existing provision for TC 13-A-202-1A

443-2-A; 1632-1; deleted SL's power to limit period of corporate existence by its articles; such limitation believed unnecessary

(b) 443-2-B; no direct TC provision; 1632-2 expand

SL section by deleting "any court of law"; expand for all be spelling out administrative and other proceedings

13-A-202-1B

(c) 443-2-C; no direct TC provision; 1632-3; using

"corporate seal" as we are treating all financial institutions as corporations, whether in mutual or stock; expansion for SB, as power to change seal now explicit

13-A-202-1C

(d) new provision to make explicit what is implicit
in 1663; 1041, 443-2-U

13-A-202-D

(e) new, making explicit implicit powers

13-A-202-E; 443-2-D

(f) new, making implicit explicit powers

13-A-202-F

(g) 443-2-Q; 991-11; 1632-8; 13-A-202-B

conformed all sections to language of

13-A-202-G

(h) no direct TC provision; 1632-13; 443-2-U

13-A-202-H

makes explicit for SB and TC; limits existing
law for SL by removing power to rescind, etc.

(i) 472-7; 1632-16; new for TC's conform with 472-7

application of 13-A-202-S and 13-A-719

(j) 1632-7; new for SB & TC

1. for all institutions pursuant to 9/17 meeting with
Gelder and Brown

(a) 443-2-L, new as to TC & SB

1. 443-2-I; 1834-4 new as to CB expands 1834-4,
by removing the "New England" limitation
2. Also expands for SB's by permitting deposits in
any insured institution
3. Query: what about large demand deposits etc.

1. 444; 1714; new as to trust companies, but power implicit before; may want to add that if TC keeps in trust dept. FDIC limits do not apply

1. 1598, 441-8 cross reference to prohibitions

sections governing use of certain words

(b) (1) took out "vote of board" since change of name requires an amendment of the articles of incorporation

(b) (3) removed S&L filing with recorder of deeds, as articles are no longer required to be filed there

(d) from 1598

1. 6-6
2. has the effect of being a large basket clause under which the superintendent may authorize a wide variety of powers

(a) 474; new as applied to SL & TC

(b) 230

(c)-(e) added because Gelder wants such requirements
to apply to all institutions

(c) 475-1

(c) accretion added pursuant to Brown recommendation

(f) (2) publication not in R.21; seemed like a good
idea.

(a) 513; 1704; new re TC

(b) (1)&(2) 1707; new as to TC & SB; protection for
institution

(3) 514; new as to SL & TC; governs situation like a
totten trust account (i.e., passbook account in trust
co. form)

(c) 515

(d) 1710; new as to SB & TC

(e) 1708; new for TC & SB

(f) 1711; new for TC & SB

(g) 516; 1705

(h) 517; 517-A; 1712

(2) 517-A; new as to SL; instead of repeating all
of one, referenced back to (1) procedures

(i) 42; applied to all

Added "federally chartered" to this section to include §226. No reason why escheat of these accounts should not be done pursuant to notice, etc.

1. 518; expanded to include S & L

1. replacing 229
2. Title 9-A, §1.202-7

1. 1832-5; 561-1-F; used 561-1-F language as it appeared clearer
somewhat of an expansion for SB as it removes a few of the existing limitations

1. §46; general provision since at some point all financial institutions may be a drawee

1. 1833

new for TC AND SB.

(b) changed "full amount" of the original loan to
"unpaid balance"

(a) 443-2-J; 225; deleted licensing section of 225 as
it does not pertain to financial institutions

(b) 991-4; 443-2-M; deleted from 991-4

"receive on deposit for safekeeping..."; including
such language would be a tremendous expansion of
deposit powers

1. R.4 and 8/23 committee meeting
2. (c) (2): see Federal Reserve Act §23A

1. this chapter will effectively delete 442, 1003
and 1595
 - (a) "all or part" used to permit limited service and
agency offices

R.7

(c) added "institution" of the same type, not
contained in the recommendation;

(d) new; seems logical to permit converting into
a full-time

1. 442, 1004, 1597

(a) 442-2; added "needs and convenience" to more
closely parallel R.44

- (a) & (b) together will permit the superintendent to differentiate among applications
- (c) Cross to R.44 gives tremendous amounts of discretion to the superintendent in determining types, etc. of branches. Ability to impose conditions will provide superintendent with specific authority to govern EFTS facilities

QUERY: do we want to give the superintendent specific powers to define all terms not expressly defined by this Title? Would be helpful for such concepts as "same location" etc.

- (d) 1003; 1595; 442 extension of time new

1. 1835-1; 443-2-F

Gelder and Brown indicated that they wanted the real estate provisions to apply across the board to all institutions; however, a limit on office facility investment would appear to be about as far as we can go, since banks will be actively engaged in real estate

1. Note: Overall, this requires a close review of applicable federal law.

(a) 225

(b) 1225; now requires affirmative action by the superintendent; 1225 had that the action was approved if super. did nothing

(c) 1226;

(e) 1230

(f) 1222

(g) 1221; necessary to maintain this section because of Sec. 2 of the Federal Reserve Act

(h) 1223

(b) Resulting stock institution: added to prevent
raid on earnings accumulations pursuant to Gelder &
Brown meeting 9/17

(a) 1961; FHLBB permits SB to become FSLA

(a) (1) 1961-1

(a) (2) 1961-1

(a) (3) 1961-1

(a) (4) 1961-2

(a) (5) 1961-2

(b) 1962

(b) (4) 1962-2

(b) (5) 1962-2

(c) 1221

(d) 1222

1231; expanded to cover all financial institutions
and to conform with idea that different type institu-
tions may merge

(a) 1171; 2032; 651 change for SL & SB

SB presently: superintendent can institute procedures without a court order

SL: presently provides for a period in which corrective action can be taken; this seems a little redundant, since presumably superintendent would be issuing orders all along as a result of examinations etc and period for corrective action should have passed by the time a conservator is appointed

(a) (3) 2032-3 & 4

(b) 651; 653 implicit in 1171; 1172 and 2032

(c) (1) 651; 652

(c) (2) 1172; 1173

(d) 654; new for SL & SB but necessary for purposes of consolidating statute

(e) 655

(e) (2) derived from 1173; added power for SL & SB

(f) 1174; 2032-5

(g) 657

(h) 2032-2

(i) 658; new to SB & SL; expanded to include situation where conservator is not the superintendent

1. 691; 2031
2. welfare of the community language added pursuant to
9/17 meeting w/ Gelder
new as to TC

692 thru 697 (already applicable to TC through 951);

2033

- (a) 692
- (b) 2033
- (c) 693
- (d) 693
- (e) reflects provision in 951
- (f) 694; 2035
- (g) 695
- (h) 696

2036; expansion for SB's

1175 expanded powers

1. R.22; 472-2; 1041 1661

(a) added "officer" to the group within the prohibitions

"any financial institution etc. authorized to do business" should be broad enough to include federal charters

new 390 (a) may be an expansion of existing law, as it would permit a person to be a director etc. of an out-of-state institution; should be okay, since the interlock danger would be absent

(a) & (b): used "financial institution holding companies" to take into account future possibilities w/ stock SB & SL

(c) designed to preserve the existing limitations; does impose definite cut-off point for SL

(d) to cover a contingency not considered by the
committee

1. 1134; holding company and subsidiary stock
new and should be brought before the com-
mittee

subsidiary stock question: it may never
actually come up

QUERY: loans secured by stock in holding
company affiliates

section new re SB & SL; necessary b/o of
stock organization and conversion powers.

(c) new.

- (b) derived from 1132; new as to SB & SL's;
105% chosen to permit loans on homes etc;
while an expansion of lending powers, there
would appear to be adequate security under such
a section.
- (c) 1133; formerly a separate section; new to
SB & SL's

1. 6-3

\$100 used pursuant to meeting with Brown and
Gelder on 9/17

1. 473-3
2. director added because of Bureau recommendations

1. 443-1; 404 of present statute to be deleted as language identical to that in 443-1
2. (b) 443-2-E preserved as general, broad grant of authority and as a supplement to the established in pt. 3

1. 476-1, first paragraph.
2. (b) added to provide cross-reference to chapters 30 and 31 on formation and return of capital contributions.
3. Section covers all deposits, including demand and NOW accounts, It is not a liquidity provision, but provides for only a loss reserve.
4. provided clause to indicate that surplus must be segregated, not to be used for things like redemption.
5. language in (a) on lesser amount added to conform with savings and loan provisions

1. New section; set by regulations as indicated by Committee meeting 8/23/74
2. Deposit language from FHLB Regs.
12 C.F.R.545.4-1

Recommendation 11; (b) also permits interest to be paid on reserves.

3. "competitive equality" language so that Superintendent may take into account interest on reserves and to provide trust companies with standing to challenge
4. "operating in this state" goes to competitive equality with federally chartered institutions.
5. Cross-reference to trust company reserve requirements to eliminate need for immediate regulation and to maintain status quo.

1. new; define surplus accounts
according to Brown telephone
call 8/26/74

1. (a) §511; combined to make reading easier, superintendent used throughout.
2. (b) 477-5; 511
3. (c) derived from 1702; reflects recommendation 12 (requiring insurance) and incorporates FSLIC and FDIC deposit designation.
4. (d) 477-5; included here as it does not go to manner in which dividends are actually paid, but to establishing the deposit relationship.
5. (e) 477-5 (see 4)
6. (f) derived from 1702; to prevent savings bank from introducing anti-competitive accounts.

1. 477-1,2,3,4 (477-5 in 410)
2. Superintendent inserted to conform.
3. Earned surplus used to conform to definitions.
4. (b) Added because of conversion and stock formation.
5. (d) could be left to regulations

1. 561-1, A,B,C,D,G,H.
2. 561-1-E now in §424
3. 561-1-F now in §344
4. 561-1-G; reorder wording to read better deleted
"secured by a first mortgage" as this limitation
is stated in first part of section.

- (a)
 - 1. 562-5 incorporated in grant of authority
 - 2. 562-4 deleted, now incorporated under revision §424.
- (b)
 - 1. New, to reflect 8/24 Committee meeting.
 - 2. Authority language derived from §1832-10.
 - 3. Subparagraphs (a)-(d) from 8/24 meeting.
 - 4. See §424 for deposit limitation treatment.

1. 80% limitation from 561-1-E, as amended.
2. Change of cross reference to 421(f).
3. New provision, reflecting operation of 562-4 (lease loans) and Committee decision 8/24/74 regarding mobile home loans; see §423.

1. Recommendation 14b
2. see 546-1; commercial loan conditions maintained pursuant to telephone conversation with Brown

443-2-F

1. Change of wording to make section read easier.
2. Added "whichever is greater" to clarify intent of existing statute.
3. Bureau: definitional question on "reserve".
4. Broke existing section into two paragraphs.
5. "book value" language to conform with 583.

1. 582.
2. combined into one sentence to clearly indicated that scope restricted by the Housing and Urban Development Act.
3. 583; included in same section as 582 for conformity.
4. "real estate owned in which such bank or any of its branches or its bank-related facilities are located" deleted and reference to 431 [443-2-F] included.

1. 626; change to superintendent and change bank to institution to reflect 440.
1. 627; Change "bank" to "institution" to reflect 440.

1. to reflect new provision for stock
thrifts, change "banking corporation"
to "financial institution".
1. new material designed to remove any
doubt as to power to acquire subsidiaries
for authorized activities.

1. to conform to R.46, added language which eliminated investment in BHC which in the future are owners of Maine banks through operation of R.3.

1. see question page in outline; change "savings bank" to "institution" for conformity.

1. Same
1. change "bank" to "institution" for purposes of conformity.
2. Qualifiers added to distinguish this provision from R.46 which goes only to Maine financial institutions.
3. qualifier to permit formation of SB holding company.

1. 635; change language to "financial institutions organized under Part 3 of this Title".
2. NOTE: unless bank statutes are cross-referenced to this provision may have to spell out again completely.
3. statutory cross-reference

1. 401; deleted first sentence.
2. deleted "mutual" to reflect stock formation
3. "that" added for clarity

1. 1045
2. changed surplus fund to reserve against losses to conform with part 3 terminology.
added language spelling out function of reserve for conformity purposes.
(c) added to take into account possibility of a mutual trust company;
(c) tied in with Part 3 section on withdrawal of capital deposits

1. 1044; reworked or reordered; subsections added.
2. 1044-5 now in separate section: 503
3. Present percentage limitations retained.
4. By separating out, superintendent's authority to change requirements more prominent.

1. 1092; same
2. added Maine Housing Authority pursuant to
Bureau request

1. 991-2 except for deletion of power to borrow.

1. 1131; broken down into subsections.
2. added mutual trust company language. 10% of deposits should approximate coverage for stock companies.
3. "capital stock" and "earned surplus" language substituted for definitional conformity

1. 1135; same; deleted all after first sentence, deleted portions to be placed in pt. 3

1. 991-3; change statute cite to reflect that Title III, §500-505 were repealed and replaced and that Title 38 has been enacted into positive law.

1. 991-9; broken into subsections.
2. "total" added to surplus, to include capital and earned surpluses.

1. 954; subdivisions added
2. added words "operating in this state"
to include companies regardless of
charter

1. 953; deleted first sentence; first sentence to be moved to Ch. 32 on general powers

1. derived from 1838 and 476-1

1. 1836
2. rearranged and broken down into subsections.
3. checking and NOW accounts are excluded, as they are covered by a separate reserve requirement section.
4. In effect, this will be a transition section, since all savings and loans will be required to obtain FSLIC insurance. At that point, subsection (d) will govern the situation.
5. 8/28 TC with Brown - he wants similar liquidity rules for savings banks.
6. last paragraph of (b) derived from §1044 governing trust companies

1. new introductory sentence to cross reference to NOW & demand deposits.
2. (a) "by-laws" added, e.g. federal chartering provisions.
3. (d) 1837, provided clause added based on similar language in the savings bank provisions (see 477-5)
4. (a) 1702
5. 477-5

1. 1703, added "or deposits"
2. added "or depositor" to limitation on participation value.
3. deleted subsection captions

1. taken from 1702 and placed into a separate section.

1. 1752; broken down into subsections
2. "provided that" clause added to take care
of stock savings and loans

1. 1753
2. added "depositor" to "member"
3. broken down into subsections.

1. (a) 1832-1; deleted "mobile homes" as that will be covered in a separate section.
- (b) 1832-1A and B consolidated.
- (c) 1832-1-C; deleted "mobile homes", in
- (6) (ii) left in 20% of assets limitation, as this goes to certain types of loans, total loans of all types limited to deposits plus surplus
- (d) 1832-1-D
- (e) 1832-1-E; asset limitation left in because of subsequent aggregate loan limitation.
- (f) 1832-1-H
- (g) 1832-1-I
- (h) 1834-3; this section could be dropped if the inclusive definition of "making a loan" is used.
- (i) 1832-1 (F)

1. 1832-8; deleted "of the fee" and added "air rights leases"
2. In subsection (2), changed 66 2/3% to 80% to conform with savings bank lease lending limits.
3. Deleted 5% of assets limitation.
4. See SB §423, and comments thereto.
5. Conform with 8/23 Committee meeting.
6. 1832-10

1. Recommendations 14(a) and 15.

(a) "home improvement loans" used to specifically include 1832-4 authority.

1. Recommendation 14 (b)

(b) This section is derived from 564-1; Bureau indicated on 8/29 that it wanted to preserve the existing limitations on commercial loan participations.

2. Need cross-ref. to Trust Co. statute and section there on sale of participations.

1. Recommendation 14(c)

(b) (1) to provide for similar provision
to that contained in 1832-10 on mobile
home inventory financing

(b) (2) to cover existing law §1834-6

(b) (3) 1832-9; "authorized to do business"
used to include out-of-state and to have
general applicability.

1. Recommendation 14(d)

(b) to reflect August committee meetings

(a) 1832-2; added insurance policy pledge

(b) 1832-4-B

(c) 1832-7

1. 1832-1-G, as amended.

(b) removed requirement of application by the association. This will permit Superintendent flexibility in dealing with supervisory problems.

(c) contains "out"

1. reference to bank-holding company type activities and service corporation activities pursuant to Pt. 3.

1. 1632-11; as written this section would most likely be interpreted as only applying to mutual SL's, which may be preferred.

1. 1632-12; limited to mutuals pursuant to
8/29 TC with Bureau
2. similar could be granted to all mutuals
(CB & SB).

1. 1632-9
2. This may be a restriction to be applied to all institutions.

1. 1901; broken into subsections
2. (c) could be left to superintendent's general enforcement powers.

- (a) 2641
- (b) 2641-2
- (c) new for conformity w/301, 311
- (d) 2641-4

§715

'added pursuant to request from Desveaux on expansion
of credit union powers

1. 2685
2. patterned after reserve requirements of the
federal credit union act

(a) 2687

(b) 2687

(c)(1) R.25; my notes indicate that the "other
financial institutions" may have been dropped.

(c)(2) 2687; allows Bureau some time to get
regulations out.