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Via electronic delivery to:

Mr. Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Re: RIN number 3064-AD66; Assessments, Large Bank Pricing NPR
RIN number 3064-AD66; Assessments, Assessment Base and Rates NPR

Dear Mr. Feldman:

I am writing to comment on two notices of proposed rulemaking (NPR) published in the Federal Register (FR) on November 24, 2010, which I have labeled as the Large Bank NPR and the Assessment Base NPR. Although the Supplementary Information differs between the two NPRs, the proposed regulation on which comments are requested is identical for the two NPRs. Therefore, I am submitting identical comment letters on the two NPRs. Where appropriate, I will indicate which NPR's Supplemental Information I am referring to, along with an FR page number, when commenting on the FDIC's discussion of its rationale for the proposed changes in its assessment practices.

I am submitting this comment letter on my own behalf and not on behalf of any client or other organization. However, I know from numerous discussions with bankers and others that I am not alone in finding numerous flaws in the proposed regulation as well as conflicts between the proposed regulation and the Federal Deposit Insurance Act. (FDIA) These flaws and conflicts in the proposed regulation are so serious and so irreparable that the FDIC should scrap the proposed regulation and start from scratch in designing a risk-based assessment system that reflects the actual risk of loss each insured depository institution (IDI) poses to the Deposit Insurance Fund (DIF).

The proposed regulation does not conform with the FDIA's risk-based assessment requirement

The proposed regulation does not conform with this provision in 12 U.S.C. Sec. 1817(b)(1)(C): "the term 'risk-based assessment system' means a system for calculating a depository institution's assessment based on the probability that the Deposit Insurance Fund will incur a loss with respect to the institution, taking into account the risks attributable to . . ." [emphasis supplied]. It is important to note that the statute refers only to losses that the DIF may

incur – there is no reference to losses that other elements of the Federal government, such as the Treasury or the Federal Reserve, may incur in preventing or dealing with a bank failure.

While the intent of Sec. 331 in the Dodd-Frank Act (DFA) was to shift a portion of the FDIC's assessment base to IDIs which rely relatively more heavily on non-domestic-deposit funding (essentially the larger IDIs), the DFA clearly did not modify the definition of a "risk-based assessment system" or relieve the FDIC of its obligation to reasonably estimate an individual IDI's probability of causing a loss to the DIF, as was noted on page 866 of the Conference Report accompanying the DFA. If Congress had intended to increase the portion of assessments levied on large IDIs then it would have modified the FDIA's definition of "risk-based assessment system" to permit that. Congress did not take that step.

Because Congress did not modify the definition of "risk-based assessment system," the FDIC is obligated to neutralize, in its assessment rate structure, the effect of the enlargement of the assessment base so as not to impose on larger IDIs more of the premium assessment burden than can be justified by the FDIC's loss experience with larger IDIs. That is, however much the FDIC might want to shift as much of the DIF assessment burden as possible to larger IDIs, that assessment burden must still bear some reasonable relationship to the FDIC's loss experience with larger IDIs.

The FDIC has estimated (as published in the Third Quarter 2010 Quarterly Banking Profile) that the share of the assessment base attributable to IDIs with more than \$50 billion in total assets will rise from 59% of the total assessment base (total domestic deposits) to 69% of the total base (total assets minus Tier 1 capital), yet the largest failed IDI in recent years (Colonial Bank) had just \$25 billion in assets; the infamous Indy Mac was the second largest, with \$23.5 billion in assets.

That is, while all of the DIF's losses in recent years (since February 2007 when failures resumed after a 31-month stretch with no failures) have occurred in smaller IDIs, the bulk of the FDIC assessment base, and future premium collections, will come from IDIs of a size which have not generated any losses for the DIF. It is quite possible, under the assessment system proposed in the NPR, that IDIs with more than \$50 billion in total assets will pay more than 69% of the total DIF assessments. While there is some element of cross-subsidy within deposit insurance, from the large to the small, the degree of cross-subsidy due to the assessment rates proposed in the two NPRs is not defensible.

The following table¹ shows the distribution of the FDIC's losses in failed IDIs for the 2007-10 period relative to the distribution of the assessment base in 2011 by size of IDI, as estimated by the FDIC – see lines 355 to 360 of the appended spreadsheet for the size distribution of DIF losses in the 2007-10 period.

¹ The data in the this table as well as all other failed-bank data in this letter are derived from the appended spreadsheet the writer of this letter has compiled for all banks which failed in the 2007-10 period at a loss to the FDIC. The data in the spreadsheet was taken from FDIC news releases announcing bank closures and from bank call reports and thrift financial reports. This data has also been summarized in various ways – see lines 332 to 418 of the appended spreadsheet. Email the writer of this letter (bert@ely-co.com) to obtain a sortable Excel version of this spreadsheet by reply email.

<u>Bank asset size range</u>	<u>% of FDIC losses</u>	<u>Portion of 2011 assessment base</u>
Less than \$1 billion (265 failures)	22.8%	10.9%
\$1 billion to \$10 billion (51 failures)	34.8%	10.4%
\$10 billion to \$25 billion (8 failures)	42.5%	6.3% ²
\$25 billion to \$50 billion (0 failures)	0%	3.8% ²
Over \$50 billion (0 failures)	0%	68.6%

In sum, IDIs in the size range (less than \$25 billion) which accounted for 100% of the FDIC's losses in failed IDIs in recent years will account for less than 28% of the FDIC's 2011 assessment base and most likely less than 28% of total assessments paid to the FDIC. As the FDIC notes approvingly in its Large Bank NPR (FR page 72612), the FDIA provides, in 12 U.S.C. 1817(b)(1)(D), for separate deposit-insurance assessment systems for large and small IDIs. Based on the FDIC's loss experience in recent years, smaller IDIs should be under a separate assessment system which results in their paying much higher deposit-insurance assessments per dollar of assessment base than larger IDIs would pay.

The NPRs fail to make the case for extrapolating small-bank failure data to large IDIs

The size distribution of failed IDIs relative to non-failed IDIs (as reflected in the distribution of the assessment base by IDI size) is especially relevant given that the FDIC proposes to extrapolate from data about small-IDI failures in determining risk factors for much larger IDIs. That is the case because the FDIC has very limited data on larger failed IDIs because there have been so few of them. The validity of this extrapolation is even more questionable when extended to highly complex IDIs given the enormous difference between the size and complexity of failed IDIs and highly complex IDIs.

In some cases, the FDIC has reached back to 2000 for data on which to base its predictive factors (see for example in the Large NPR, FR page 72614, right column, and FR page 72620, footnote 25), but only 29 small IDIs failed between 2000 and 2004; none failed in 2005 and 2006. Additionally, the assets of these 29 failures totaled to just \$6.22 billion, not even the equivalent of one "large" IDI in the FDIC's eyes. The largest and most costly of these 29 failures was the 2001 closure of the notorious OTS-regulated thrift, Superior Bank (assets of \$1.77 billion), which accounted for 39% (\$305 million) of the \$781 million loss the FDIC experienced in those 29 failures.³

Worse, it appears that the FDIC has treated as failed IDIs institutions in which the resolution did not cause a loss to the DIF, as is evident in footnote 33 in the Large Bank NPR (FR page 72624), which states that "for the purpose of regression analysis, large institutions that received significant government support or merged with another entity with government support" were treated as failed institutions. The FDIC does not name these institutions nor provide the legal justification for including them in the FDIC's failure analysis if they did not cause a loss to the DIF.

² The writer of this letter estimated this division of the 2011 assessment based on September 30, 2010, call report data.

³ On February 9, 2001, the writer of this letter wrote to Ellen Seidman, then Director of the OTS, warning her of Superior's insolvency; a copy of that letter was sent to Donna Tanoue, then Chairman of the FDIC. On July 27, 2001, the OTS closed Superior. On October 16, 2001, the writer of this letter testified to the Senate Banking Committee about the regulatory failings which led to Superior's failure, as set forth in Senate hearing document 107-698.

The efficacy of the factors the FDIC used in developing its assessment formulae is further open to challenge based on a statement in the Large Bank NPR at the bottom of the right column on FR page 72629, which reads as follows:

Chart 2.1 below shows that the total score can reasonably differentiate IDIs that failed after 2006. About the worst 12 percent of IDIs in terms of their total score as of year-end 2006 accounted for more than two-thirds of failures over the next three years.

This is an extremely damning admission, for this reason. There were 8,680 IDIs at the end of 2006; 12% of that number would be 1,042 IDIs. In the 2007-09 period (the period covered by the FDIC analysis), there were 167 IDI failures; two-thirds of that number would be 111. Consequently, 111 of the worst 1,042 IDIs at the end of 2006 failed, which means that 931 of the worst IDIs, or 89.3% of the worse IDIs did not fail. In effect, the FDIC's assessment methodology, based on predicting which IDIs will fail, is itself a failure. For this reason alone, the FDIC should go back to the drawing board and start from scratch in developing much better risk-sensitive pricing formulae.

Interpolating the above-referenced Chart 2.1 (on FR page 72630), the one-third of the failures not among the worst 12% of the IDIs at the end of 2006, were spread widely over the next 40% or so of the IDIs evaluated at the end of 2006. In effect, a significant portion of the IDIs which failed in the 2007-09 period were not identified at the end of 2006 as among the worst IDIs. Further, given that conditions were pretty good in the banking industry at the end of 2006 – there had not been a bank failure in 18 months and there were only 50 IDIs (.56% of all IDIs at that time) on the problem-bank list with total assets of just \$8.3 billion (.07% of total industry assets) – it is reasonable to challenge the FDIC's contemporaneous ability to detect emerging banking problems and therefore to properly price DIF assessments.

To assess its contemporaneous ability to detect potential IDI failures, and to set assessment rates accordingly, the FDIC should publish data contrasting the two-thirds of failures in the 2007-09 period among the worst IDIs at the end of 2006 with the one-third not among the worst IDIs. That contrast will give bankers and others a better understanding of the myriad shortcomings in the FDIC's risk-assessment practices and techniques. A companion analysis would be to track the fate of the 50 IDIs on the problem-bank list at the end of 2006 to see (1) how many of them later failed and (2) the degree of overlap between those IDIs, the 167 IDIs which failed over the next three years, and the worst IDIs at the end of 2006 that the FDIC recently identified. Any lack of overlap among these IDIs may be due in part to the failure of the FDIC to reflect geography in its determination of risk-based assessments, as the next section of this letter discusses.

The proposed regulation fails to take the geography of failed banks into account

The FDIC has failed to take geography into account in constructing its assessment formulae. That is, the DIF's loss experience for the 2007-10 period varied dramatically by the state in which the IDI was chartered, which, in the case of smaller IDIs, usually is the state in which the IDI experienced much, if not most, of the losses that sank it. This geographical data can be summarized as follows and will be found on lines 414 to 418 of the appended spreadsheet:

<u>States</u>	<u>% of FDIC losses</u>	<u>% of US, PR population</u>	<u>Loss per capita</u>
CA, FL, GA, IL (169 failures)	58.9%	25.2%	\$603
AL, NV, OH, PR, TX, WA (43 failures)	27.5%	17.4%	\$409
30 other states with failures (112 failures)	13.6%	51.2%	\$69
11 states + D.C. with no failures	0%	6.2%	-0-
United States + Puerto Rico	<u>100.0%</u>	<u>100.0%</u>	<u>\$258</u>

While the national per-capita loss for the 2007-10 period was \$258, for the nine states plus Puerto Rico with the greatest aggregate amount of loss, the loss per capita for that period was \$524; for the rest of the country, the per-capita loss was just \$61. This difference in per-capita losses is a stark indicator of the importance of geography in IDI failures and DIF losses.

Not only have the DIF's losses varied greatly geographically in recent years, as was the case during the S&L crisis, but this data reinforce the value of a geographic dispersion of risks, especially real-estate-related risks. Geographical risk dispersion is much more likely to be an attribute of, and therefore a strength of, larger IDIs yet the FDIC assessment formulae provide absolutely no recognition of, or more importantly, credit for geographical risk dispersion in the premium assessment formulae it has proposed for large IDIs and highly complex institutions.

The FDIC's proposed assessment formulae also completely ignore another geographical factor that is especially important with regard the largest IDIs – their non-U.S. risk exposures. Possibly one reason for the absence of that factor is that, to the best of this writer's knowledge, none of the 324 IDIs which have failed since 2007 had any meaningful non-U.S. losses. Implicitly, the FDIC has extended to the non-U.S. assets of FDIC-insured institutions its U.S. loss experience which in turn has varied greatly across the country. There is absolutely no justification for the FDIC to have made such an assumption.

The FDIC has failed to provide the data on which it has based its proposed assessments

The Large Bank NPR presents copious results – values, scores, cutoff values, weights, etc. – which are the product of extensive FDIC analyses of IDI data, results which purportedly demonstrate the analytical soundness of its risk-based assessment scheme. However, the FDIC has not provided public access to the data on which the results published in the NPR are based. Consequently, it is not possible for an outsider to evaluate the logic, methodology, reasonableness, or accuracy of those results. Instead, the FDIC is asking bankers and members of the public to take these results on faith. Since the calculations from which the published results were derived presumably are based on publicly available data, i.e., call reports, thrift financial reports, and other public data, it should be feasible for the FDIC to post on its website the data on which it based its calculations. Making the underlying data publicly available would permit independent verification of the results on which the proposed assessment regulation in the NPRs is based.

The quantitative validity of the results the FDIC presents in the Large Bank NPR are highly suspect given the numerous references in that NPR to the opinions of FDIC analysts as to the relative riskiness of large IDIs. See, for example, “based on a consensus view of FDIC analysts” (FR page 72613, right column); “The rank ordering for larg [sic] institutions as of the end of 2009 (based on a consensus view of staff analysts)” (FR page 72614, footnote11); “The FDIC believes . . .” (RF page 72618, right column); “This discretionary adjustment . . .” (FR page 72623,

left column); “providing the FDIC with flexibility to give sufficient weight to the idiosyncratic factors or other risk factors not included in the scorecard.” (FR page 72623, center column); or “the FDIC’s view, based on its experience and judgment, of the proper rank ordering of risk (the expert judgment ranking)” (FR page 72624, right column).

FDIC staff may have devoted substantial effort to developing rank orderings of the riskiness of large and highly complex IDIs, but those rank orderings are merely opinions untested by actual failures which created a loss for the DIF. As noted above, the FDIA clearly limits the FDIC’s risk-based assessment system to a system “based on the probability that the Deposit Insurance Fund will incur a loss with respect to the institution.” The NPRs fail to adequately make the case that the opinions of FDIC staff are sufficiently reliable predictors of a potential IDI failure that will cause a loss to the DIF.

The proposed regulation fails to take the charter-type of failed banks into account

The type of charter of failed IDIs is another risk factor the FDIC has chosen to ignore. Of the eight IDIs with over \$10 billion in assets which have failed since 2007, five of them were OTS-regulated thrifts while a sixth was a Puerto Rico bank – Westernbank. Only two of the failures – Colonial Bank and United Commercial Bank in California – were what could be characterized as even approximating a mainstream commercial bank.

Of the eleven failures since 2007 with losses over \$1 billion, five of them, including the two most expensive failures (IndyMac and BankUnited) were thrifts. Although OTS-regulated thrifts account for only 13.3% of the failures by nose-count, they accounted for 37.8% (\$30.1 billion) of the FDIC's \$79.6 billion loss in failed IDIs since 2007 – see line 352 of the appended spreadsheet. The recent years have been the S&L crisis redux.

The FDIC's overall loss experience since 2007 has varied greatly based on who the failed IDI's primary federal regulator was. This holds true whether measuring the FDIC's loss as a percentage of the failed IDI's assets or total deposits, as is evident in the following table, taken from lines 346 to 353 of the appended spreadsheet.

<u>Regulator</u>	<u>Loss as a % of assets</u>	<u>Loss as a % of deposits</u>
FDIC	24.28%	29.58%
OCC	16.73%	19.64%
Federal Reserve	22.30%	26.67%
OTS	28.44%	43.08%

The FDIC’s proposed assessment formulae give absolutely no recognition to an IDI's primary federal regulator. It is clear from this data that on average OCC-regulated banks that failed experienced a lower loss percentage than failed IDIs regulated by other agencies

The proposed regulation fails to calculate bank-by-bank assessments for the riskiest banks

The proposed regulation continues the FDIC’s long-standing practice of not calculating (except for the unsecured debt and brokered-deposit adjustments) bank-by-bank risk-sensitive premiums for IDIs with less than \$10 billion in assets classified by the FDIC as riskier Category II, III, and IV IDIs, yet these are the categories where failures are far more likely to

occur. Accordingly, these are the IDIs where the FDIC's bank-by-bank assessment rates potentially are the most likely to deter risky banking and the prospect of failure. If FDIC staff are at all competent in identifying riskier IDIs, then most IDIs which failed in the 2007-10 period should have been classified as Category II, III, or IV institutions more than a few months before they were closed. The FDIC should publish data as to its accuracy and timeliness in classifying as Category II, III, or IV IDIs those IDIs which later failed.

FDIC staff have stated to the writer on several occasions that the FDIC lacks the staff resources to develop bank-by-bank assessment rates for every IDI in categories II, III, and IV. The failure to do so represents an inexcusable misuse of FDIC resources, resources provided to the FDIC by the banking industry. Based on Table IV-B in the FDIC's Quarterly Banking Profile for the third quarter of 2010, as of June 30, 2010, 28.8% of all IDIs, holding 39.2% of all domestic deposits, were classified by the FDIC as Category II, III, or IV institutions. In effect, the FDIC has elected to devote a disproportionately high amount of its risk-assessment resources to assessing and pricing the failure risk of the strongest 70% of the banking industry, by nose count, rather than concentrating those resources on the weakest 30%.

This misdirection of FDIC resources ignores a key reason for any form of risk-based insurance pricing – to deter unwarranted and undercompensated risk-taking. The FDIC, in its Large Bank NPR (FR page 72613), said as much when it stated that it “proposes revising the assessment system applicable to large IDIs to better capture risk at the time an IDI assumes the risk . . .” If anything, such a philosophy is more applicable to smaller IDIs since these are the IDIs much more likely to fail, at a cost to the DIF.

Another purpose of a risk-based assessment system is to provide a financial incentive to an IDI to reduce its probability of failure by increasing its equity-capital ratio, which has the effect of raising its deposit-insurance deductible. In effect, a lower assessment rate pays for an increased equity-capital ratio which reduces the probability of failure. The proposed regulation does not provide that incentive for the riskiest IDIs because it does not provide for bank-by-bank risk assessments for Category II, III, and IV IDIs with less than \$10 billion in assets.

The proposed brokered-deposit adjustment is indefensible.

For a minority of IDIs, the brokered-deposit adjustment of up to 10 basis points across the entire assessment base is punitive for special-purpose banks, such as credit-card banks, which are not using brokered deposits to grow rapidly, but are using brokered deposits as an alternative to building expensive retail branch networks. The NPR provided no cost justification for the magnitude of this adjustment or the manner in which it is applied nor any justification for imposing a brokered-deposit adjustment on large and highly complex institutions but not on smaller IDIs classified as Category I risks. Rapid growth, which does increase an IDI's risk of failure, should be addressed directly in assessment formulae regardless of how that growth is funded.

The unsecured-debt adjustment is inappropriately limited to long-term, unsecured liabilities

The proposed regulation's unsecured debt adjustment is limited to "long-term, unsecured liabilities" yet the rationale for that adjustment – "greater amounts of long-term unsecured debt provide a cushion that can reduce the cost to the DIF in the event of failure"⁴ – also applies to liabilities other than insured deposits, including (1) domestic uninsured deposits, (2) all foreign-

⁴ Assessment Base NPR, FR page 72586, footnote 8.

office deposits, and (3) short-term unsecured borrowings. The proposed regulation provides absolutely no justification for these three exclusions from the unsecured debt adjustment.

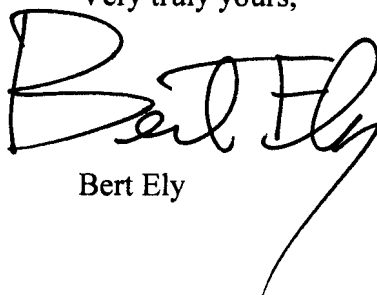
The proposed regulation fails to take fraud into account as a cause of bank failure

The FDIC's assessment formulae do not factor in the degree to which fraud plays a much larger role in the failure of small IDIs than large IDIs. Fraud can sink a small IDI overnight, but has not been identified as a factor causing the failure of large IDIs. For example, one of the IDIs which was closed on December 17, 2010, First Southern Bank, with \$192 million of assets, appears to have been the victim of an internal fraud, executed by the person who effectively controlled the IDI, involving \$22 million of bogus industrial development bonds. There are any number of small IDI failures in recent years – Keystone, Oakwood, Platinum, to name a few – where fraud was the underlying cause of the failure. Arguably large IDIs and highly complex IDIs should get an assessment credit because they are much less likely to fail due to fraud.

In sum, the proposed regulation on which the FDIC has sought comment, through the two NPRs, fails on many grounds. Consequently, the FDIC should withdraw the proposed assessment scheme and start over, taking time to develop quantitatively valid assessment formulae which recognize, sad as it may be, that DIF losses largely, if not entirely, result from the failure of relatively small IDIs.

I have appreciated this opportunity to offer my comments on these two NPRs. FDIC staff can call me, at 703-836-4101, if there is any aspect of this comment letter that they would like to discuss.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bert Ely". The signature is stylized with a large initial "B" and a long, sweeping underline.

Bert Ely

Attachment: Spreadsheet of failed-bank data

Failed banks and thrifts -- 2007 to 2010

Line number	Year's failure number	Institution Name	City	St.	Failure date	Trans-action Type	Charter #	Primary Federal Regulator	Per FDIC news release		Uninsured deposits protected*	Most recent estimated loss (\$)	Total assets	Total deposits	Total assets	Total deposits	Last reported net worth - Est. loss	Differential: Last net worth - Est. loss	Last deposit #	Estimated uninsured Domestic Deposits	Reported at earlier date
									Total assets	Total deposits											
1	156	COMMUNITY NATIONAL BANK	23306 LINO LAKES	MN	12/17/10	PA	N	1	31,600	28,800	3,700	11.7%	12.8%	2,653	9,300-10	6,353	20.1%	22.1%	N/A	N/A	
2	157	FIRST SOUTHERN BANK	58052 BATESVILLE	AR	12/17/10	PA	NM	1	191,800	155,800	22,800	11.9%	14.6%	19,250	9,300-10	42,050	21.9%	27.0%	N/A	N/A	
3	155	UNITED AMERICAS BANK, NA	35065 ATLANTA	GA	12/17/10	PA	N	1	242,300	193,800	75,800	31.3%	39.1%	(1,833)	9,300-10	73,967	30.5%	38.2%	N/A	N/A	
4	154	APPALACHIAN COMMUNITY BANK, FS	34578 MCCAYSVILLE	GA	12/17/10	PA	SA	1	68,200	76,400	26,000	38.1%	34.0%	(8,274)	9,300-10	17,726	26.0%	23.2%	N/A	N/A	
5	153	CHESTATEE STATE BANK	19040 CORAL GABLES	GA	12/17/10	PA	NM	1	244,400	240,500	75,300	30.8%	31.3%	2,124	9,300-10	71,424	31.7%	32.2%	N/A	N/A	
6	152	THE BANK OF MIAMI, NA	35561 SOUTHAMPTON	FL	12/17/10	PA	N	1	448,200	374,200	64,000	14.3%	17.1%	(775)	9,300-10	63,225	14.1%	16.9%	N/A	N/A	
7	151	EARTHSTAR BANK	112,600	FL	12/10/10	PA	NM	1	112,600	104,500	22,900	20.3%	21.9%	2,272	9,300-10	25,172	22.4%	24.1%	N/A	N/A	
8	150	PARAMOUNT BANK	34673 FARMINGTON HILLS	MI	12/10/10	PA	SM	1	252,700	213,600	90,200	35.7%	42.2%	2,571	9,300-10	92,771	36.7%	43.4%	N/A	N/A	
9	149	FIRST BANKING CENTER	5287 BURLINGTON	WI	11/19/10	PA	FRB	1	750,700	664,800	142,600	19.0%	21.5%	8,463	9,300-10	151,063	20.1%	22.7%	19,713	\$21.373 million at 6-30-10	
10	148	ALLEGIANCE BANK OF NORTH AMERICA	35078 BALA CTRYWD	PA	11/19/10	PA	NM	1	106,600	92,000	14,200	13.3%	15.4%	1,474	9,300-10	15,674	14.7%	17.0%	N/A	N/A	
11	147	GULF STATE COMMUNITY BANK	20340 CARABELLE	FL	11/19/10	PA	NM	1	112,100	112,200	42,700	38.1%	38.1%	(324)	9,300-10	42,376	37.8%	37.8%	N/A	N/A	
12	146	COPPER STAR BANK	35463 SCOTTSDALE	AZ	11/12/10	PA	NM	1	204,000	190,200	43,600	21.4%	22.9%	(2,354)	9,300-10	41,246	20.2%	21.7%	N/A	N/A	
13	145	DARBY BANK & TRUST CO.	14580 VIDUALA	GA	11/12/10	PA	NM	1	654,700	587,600	136,200	20.8%	23.2%	9,021	9,300-10	145,221	22.2%	24.7%	N/A	N/A	
14	144	TIFFON BANKING COMPANY	57831 TIFFON	GA	11/12/10	PA	NM	1	143,700	141,600	24,600	17.1%	17.4%	1,758	9,300-10	26,358	18.3%	18.6%	N/A	N/A	
15	143	FIRST VIETNAMESE AMERICAN BANK	57885 WESTMINSTER	CA	11/05/10	PA	NM	1	48,000	47,000	9,600	20.0%	20.4%	611	9,300-10	10,211	21.3%	21.7%	N/A	N/A	
16	142	PIERCE COMMERCIAL BANK	34411 TACOMA	WA	11/05/10	PA	SM	1	221,100	193,300	21,300	9.6%	11.0%	4,532	9,300-10	25,832	11.7%	13.3%	N/A	N/A	
17	141	WESTERN COMMERCIAL BANK	58087 WOODLAND HILLS	CA	11/05/10	PA	NM	1	98,600	101,100	25,200	25.8%	24.9%	(3,483)	9,300-10	21,717	22.0%	21.5%	N/A	N/A	
18	140	K BANK	31263 RANDALLSTOWN	MD	11/05/10	PA	NM	1	538,300	500,100	198,400	36.9%	39.7%	6,741	9,300-10	205,141	38.1%	41.0%	N/A	N/A	
19	139	FIRST ARIZON SAVINGS, A FS	32582 SCOTTSDALE	AZ	10/22/10	PO	SA	1	272,200	198,800	32,800	NOT	NOT	9,832	6,300-10	42,632	15.7%	21.4%	1,800	Not reported	
20	138	HILLCREST BANK	22173 OVERLAND PARK	KS	10/22/10	PA	NM	1	1,650,000	1,540,000	329,700	20.0%	21.4%	10,245	6,300-10	339,945	20.6%	22.1%	21,811	\$121.507 million at 3-31-10	
21	137	FIRST SUBURBAN NATIONAL BANK	16089 MAYWOOD	IL	10/22/10	PA	N	1	148,700	140,000	31,400	21.1%	22.4%	4,258	6,300-10	35,658	24.0%	25.5%	N/A	N/A	
22	136	FIRST NATIONAL BANK OF BARNESVILLE	2119 BARNESVILLE	GA	10/22/10	PA	N	1	131,400	127,100	33,900	25.8%	26.7%	3,168	6,300-10	37,068	28.2%	29.2%	N/A	N/A	
23	135	THE GORDON BANK	31904 GORDON	GA	10/22/10	PA	NM	1	29,400	26,700	9,000	30.6%	33.7%	670	6,300-10	9,670	32.9%	36.2%	N/A	N/A	
24	134	PROGRESS BANK OF FLORIDA	32251 TAMPA	FL	10/22/10	PA	SM	1	110,700	101,300	25,000	22.6%	24.7%	1,712	6,300-10	26,712	24.1%	26.4%	N/A	N/A	
25	133	FIRST BANK OF JACKSONVILLE	27573 JACKSONVILLE	FL	10/22/10	PA	NM	1	81,000	77,300	16,200	20.0%	21.0%	674	6,300-10	16,874	20.8%	21.8%	N/A	N/A	
26	132	PREMIER BANK	34016 JEFFERSON CITY	MO	10/15/10	PA	NM	1	1,180,000	1,030,000	406,900	34.5%	39.5%	19,076	6,300-10	42,597	36.1%	41.4%	14,150	\$13,037 million at 3-31-10	
27	131	WESTBRIDGE BANK AND TRUST CO.	58205 CHESTERFIELD	MO	10/15/10	PA	NM	1	91,300	72,500	18,700	21.5%	23.9%	3,349	6,300-10	20,040	21.9%	27.6%	N/A	N/A	
28	130	SECURITY SAVINGS BANK, FS	30898 OLAATHE	KA	10/15/10	PA	SA	1	508,400	397,000	82,200	16.2%	20.7%	16,679	6,300-10	98,879	19.4%	24.9%	6,543	\$9,869 million at 3-31-10	
29	129	SHORELINE BANK	35250 SHORELINE	WA	10/10/10	PA	NM	1	104,200	100,200	41,400	39.7%	41.3%	1,794	6,300-10	43,194	41.5%	43.1%	N/A	N/A	
30	128	WAKULLA BANK	21777 CHAMPORVILLE	FL	10/10/10	PA	NM	1	424,100	386,300	113,400	26.7%	29.4%	12,800	6,300-10	126,200	29.8%	32.7%	N/A	N/A	
31	127	NORTH COUNTY BANK	35053 ARLINGTON	WA	9/24/10	PA	NM	1	288,800	276,100	72,800	25.2%	26.4%	12,083	6,300-10	84,883	29.4%	30.7%	N/A	N/A	
32	126	HAVEN TRUST BANK FLORIDA	58308 PONTE VEDRA BEACH	FL	9/24/10	PA	NM	1	148,600	133,600	31,900	21.5%	23.9%	3,349	6,300-10	35,249	23.7%	26.4%	N/A	N/A	
33	125	MARITIME SAVINGS BANK	28612 WEST ALLIS	WI	9/17/10	PA	SA	1	350,500	248,100	83,600	23.9%	33.7%	9,421	6,300-10	93,021	26.5%	37.5%	N/A	N/A	
34	124	BRAMBLE SAVINGS BANK	27808 HILFORD	OH	9/17/10	PA	SB	1	47,500	41,600	14,600	30.7%	35.1%	468	6,300-10	15,068	31.7%	36.2%	N/A	N/A	
35	123	THE PEOPLES BANK	182 WINDER	GA	9/17/10	PA	NM	1	447,200	398,200	98,900	22.1%	24.8%	6,714	6,300-10	105,614	23.6%	26.5%	N/A	N/A	
36	122	FIRST COMMERCE COMMUNITY BANK	57448 DOUGLASVILLE	GA	9/17/10	PA	NM	1	248,200	242,800	71,400	28.8%	29.4%	3,968	6,300-10	75,368	30.4%	31.0%	N/A	N/A	
37	121	BANK OF ELLIJAY	58197 ELLIJAY	GA	9/17/10	PA	NM	1	168,800	160,700	55,200	32.7%	34.3%	9,645	6,300-10	56,145	33.3%	34.9%	N/A	N/A	
38	120	IRON BANK	57107 CHERRY HILL	NJ	9/17/10	PA	NM	1	81,600	79,700	23,900	29.3%	30.0%	1,534	6,300-10	25,434	31.2%	31.9%	N/A	N/A	
39	119	HONOLULU BANK	35061 HONOLULU	HI	9/10/10	PA	SM	1	187,800	165,600	58,900	31.4%	35.8%	5,149	6,300-10	64,049	34.1%	38.9%	N/A	N/A	
40	118	SONOMA VALLEY BANK	27259 SONOMA	CA	8/20/10	PA	NM	1	337,100	255,500	101,000	3.0%	4.0%	18,586	6,300-10	28,686	8.5%	11.2%	N/A	N/A	
41	117	LOS PADRES BANK	32165 SOLVING	CA	8/20/10	PA	SA	1	870,400	770,700	8,700	1.0%	1.1%	26,696	6,300-10	35,396	4.1%	4.6%	N/A	N/A	
42	116	BUTTE COMMUNITY BANK	33219 OHIO	CA	8/20/10	PA	NM	1	498,800	471,300	17,400	3.5%	3.7%	18,757	6,300-10	36,157	7.2%	7.7%	N/A	N/A	
43	115	PACIFIC STATE BANK	27090 STOCKTON	CA	8/20/10	PA	SM	1	312,100	278,800	32,600	10.4%	11.7%	10,883	6,300-10	43,483	13.9%	15.6%	N/A	N/A	
44	114	SHOREBANK	15640 CHICAGO	IL	8/20/10	PA	NM	1	2,160,000	1,540,000	367,700	17.0%	23.9%	9,396	6,300-10	37,096	17.5%	24.5%	193,003	\$248,092 million at 3-31-10	
45	113	IMPERIAL SAVINGS AND LOAN ASSOC.	31623 MARTINVILLE	VA	8/20/10	PA	SA	1	9,400	10,100	3,500	37.2%	34.7%	(666)	6,300-10	2,834	30.1%	28.1%	138	\$137,000 at 3-31-10	
46	112	INDEPENDENT NATIONAL BANK	27344 Ocala	FL	8/20/10	PA	N	1	156,200	141,900	23,200	14.9%	16.3%	3,094	6,300-10	26,294	16.8%	18.5%	N/A	N/A	
47	111	COMMUNITY NATL BANK AT BARLOW	25266 BARLOW	FL	8/20/10	PA	N	1	67,900	63,700	10,300	15.2%	16.2%	127	6,300-10	10,427	15.4%	16.4%	N/A	N/A	
48	110	PALOS BANK AND TRUST COMPANY	17599 PALOS HEIGHTS	IL	8/13/10	PA	NM	1	493,400	467,800	72,000	14.6%	15.4%	4,306	6,300-10	76,306	15.5%	16.3%	N/A	N/A	
49	109	RAVESWOOD BANK	34231 CHICAGO	IL	8/6/10	PA	NM	1	264,600	269,500	68,100	25.7%	25.3%	(8,067)	6,300-10	60,033	22.7%	22.3%	N/A	N/A	
50	108	LIBERTYBANK	31964 EUGENE	OR	7/30/10	PA	NM	1	768,200	718,500	115,300	14.7%	16.0%	15,787	6,300-10	131,087	17.1%	18.2%	N/A	N/A	
51	107	THE COWITZ BANK	22643 LONDONVIEW	WA	7/30/10	PA	NM	1	529,300	513,900	68,900	13.0%	13.4%	10,158	6,300-10	79,058	14.9%	15.4%	N/A	N/A	
52	106	COASTAL COMMUNITY BANK	9619 PANAMA CITY BEACH	FL	7/30/10	PA	NM	1	372,900	363,200	94,500	25.3%	26.0%	5,412	6,300-10	99,912	26.8%	27.5%	N/A	N/A	
53	105	BAYSIDE SAVINGS BANK	57669 PORT SAINT JOE	FL	7/30/10	PA	SA	1	66,100	52,400	16,200	24.5%	30.9%	1,490	6,300-10	17,690	26.8%	33.8%	N/A	N/A	
54	104	NORTHWEST BANK & TRUST	57638 ACWORTH	GA	7/30/10	PA	NM	1	167,700	159,400	39,800	23.7%	25.0%	1,146	6,300-10	40,946	24.4%	25.7%	N/A	N/A	

Line number	Year's failure number	Institution Name	City	St.	Failure date	Trans-action Type	Chart	#	Primary Federal Register	Per FDIC news release	Total deposits	Uninsured deposits protected	Most recent estimated loss (\$)	Total assets	Total deposits	Last reported per worth Amount	Date	Differential + Est. loss	Differential %	Estimated uninsured domestic deposits Reported at earlier date	
67	91	WOODLANDS BANK	32371 BLUFTON	SC	7/16/10	PA	SA	1	OTS	376,200	355,300	Protected	115,000	30.6%	32.4%	8,130	3-31-10	123,130	32.7%	34.7%	N/A
68	90	HOME NATIONAL BANK	11656 BLACKWELL	OK	7/9/10	PA	NM	1	FDIC	644,500	560,700	Protected	78,700	12.2%	14.0%	19,126	3-31-10	97,826	15.2%	17.4%	N/A
69	89	USA BANK	58072 PORT CHESTER	NY	7/9/10	PA	NM	1	FDIC	193,300	189,900	Protected	61,700	31.9%	32.5%	2,550	3-31-10	64,250	33.2%	33.8%	N/A
70	88	IDEAL FEDERAL SAVINGS BANKS	32456 BALTIMORE	MD	7/9/10	PO	SA	1	OTS	6,300	5,800	NOT	2,100	33.3%	36.2%	260	3-31-10	2,360	37.5%	40.7%	602 \$650,000 on 12-31-09
71	87	BAY NATIONAL BANK	35462 LUTHERVILLE	MD	7/9/10	PA	NM	1	FDIC	282,200	276,100	Protected	17,400	6.2%	6.8%	4,928	3-31-10	22,328	7.9%	8.1%	N/A
72	86	HIGH DESERT STATE BANK	35279 ALBUQUERQUE	NM	6/25/10	PA	NM	1	FDIC	80,300	81,000	Protected	20,900	26.0%	25.8%	(735)	3-31-10	20,165	25.1%	24.9%	N/A
73	85	FIRST NATIONAL BANK	34152 SAVANNAH	GA	6/25/10	PA	NM	1	FDIC	252,500	231,900	Protected	68,900	27.3%	29.7%	4,877	3-31-10	73,777	29.2%	31.8%	N/A
74	84	PENNSYLVANIA BANK	26583 ENGLEWOOD	FL	6/25/10	PA	NM	1	FDIC	644,300	580,100	Protected	194,800	30.2%	33.6%	12,683	3-31-10	207,483	32.2%	35.8%	N/A
75	83	NEVADA SECURITY BANK	57110 RENO	NV	6/18/10	PA	NM	1	FDIC	480,300	479,800	Protected	80,900	16.8%	16.9%	12,011	3-31-10	92,911	19.3%	19.4%	N/A
76	82	WASHINGTON FIRST INTERNATIONAL BK	33955 BEATLE	WA	6/11/10	PA	NM	1	FDIC	520,900	441,400	Protected	158,400	30.4%	35.9%	10,241	3-31-10	168,641	32.4%	38.2%	N/A
77	81	TIERONE BANK	29341 LINCOLN	NE	6/4/10	PA	SA	1	OTS	2,800,000	2,200,000	Protected	297,800	10.6%	13.5%	79,598	3-31-10	377,398	13.5%	17.2%	57,914
78	80	ARCOLA HOMESTEAD SAVINGS BANK	31813 ARCOLA	IL	6/4/10	PO	SSB	1	FDIC	17,000	18,100	NOT	3,200	18.8%	17.7%	(1,135)	3-31-10	2,065	12.1%	11.4%	0
79	79	FIRST NATIONAL BANK	15814 ROSDALE	MS	6/4/10	PA	NM	1	FDIC	60,400	63,500	Protected	12,600	20.9%	19.8%	(3,178)	3-31-10	9,422	15.6%	14.8%	N/A
80	78	SUN WEST BANK	34785 LAS VEGAS	NV	5/28/10	PA	NM	1	FDIC	360,700	353,900	Protected	96,700	26.8%	27.3%	4,672	3-31-10	101,372	28.1%	28.6%	N/A
81	77	GRANITE COMMUNITY BANK, N.A.	57315 GRANITE BAY	CA	5/28/10	PA	NM	1	FDIC	102,900	94,200	Protected	17,300	16.8%	18.4%	3,060	3-31-10	20,360	19.8%	21.6%	N/A
82	76	BANK OF FLORIDA - TAMPA BAY	57184 TAMPA	FL	5/28/10	PA	NM	1	FDIC	245,200	224,000	Protected	40,300	16.4%	18.0%	(2,177)	3-31-10	38,123	15.5%	17.0%	N/A
83	75	BANK OF FLORIDA - SOUTHWEST	35106 MAPLES	FL	5/28/10	PA	NM	1	FDIC	640,900	559,900	Protected	91,300	14.2%	16.3%	(15,832)	3-31-10	75,468	11.8%	13.5%	N/A
84	74	BANK OF FLORIDA - SOUTHEAST	57360 FORT LAUDERDALE	FL	5/28/10	PA	NM	1	FDIC	595,300	531,700	Protected	71,400	12.0%	13.4%	7,069	3-31-10	78,469	13.2%	14.8%	N/A
85	73	PINEHURST BANK	57735 ST PAUL	MN	5/21/10	PA	NM	1	FDIC	61,200	58,300	Protected	6,000	9.8%	10.3%	(446)	3-31-10	5,554	9.1%	9.5%	N/A
86	72	MIDWEST BANK AND TRUST COMPANY	18117 ELMWOOD PARK	IL	5/14/10	PA	SM	1	FRB	3,170,000	2,420,000	Protected	216,400	6.8%	8.9%	85,539	3-31-10	301,939	9.5%	12.5%	373,411 million on 12-31-09
87	71	SOUTHWEST COMMUNITY BANK	34255 SPRINGFIELD	MO	5/14/10	PA	NM	1	FDIC	96,600	102,500	Protected	29,000	30.0%	28.3%	(2,203)	3-31-10	26,797	27.7%	26.1%	N/A
88	70	NEW LIBERTY BANK	35586 PLYMOUTH	MI	5/14/10	PA	NM	1	FDIC	109,100	101,800	Protected	25,000	22.9%	24.6%	117	3-31-10	25,117	23.0%	24.7%	N/A
89	69	SATILLA COMMUNITY BANK	35114 SAINT MARKS	GA	5/14/10	PA	NM	1	FDIC	135,700	134,000	Protected	31,300	23.1%	23.4%	1,176	3-31-10	32,476	23.9%	24.2%	N/A
90	68	1ST PACIFIC BANK OF CALIFORNIA	35517 SAN DIEGO	CA	5/7/10	PA	SM	1	FRB	335,800	291,200	Protected	87,700	26.1%	30.1%	11,201	3-31-10	98,901	29.5%	34.0%	N/A
91	67	TOWNE BANK OF ARIZONA	57697 MESA	AZ	5/7/10	PA	NM	1	FDIC	120,200	113,200	Protected	41,800	34.8%	36.9%	479	3-31-10	42,279	35.2%	37.3%	N/A
92	66	ACCESS BANK	16476 CHAMPLIN	MN	5/7/10	PA	NM	1	FDIC	32,000	32,000	Protected	5,500	17.2%	17.2%	(100)	3-31-10	5,400	16.9%	16.9%	N/A
93	65	BANK OF BONIFAY	14246 BONIFAY	FL	5/7/10	PA	NM	1	FDIC	242,900	230,200	Protected	78,700	32.4%	34.2%	1,616	3-31-10	80,316	33.1%	34.9%	N/A
94	64	FRONTIER BANK	22710 EBERETT	WA	4/30/10	PA	NM	1	FDIC	3,500,000	3,130,000	Protected	1,370,000	39.1%	43.8%	16,275	3-31-10	1,386,275	39.6%	44.3%	402,534
95	63	BC NATIONAL BANKS	17792 BUTLER	MO	4/30/10	PA	NM	1	FDIC	67,200	54,900	Protected	11,400	17.0%	20.8%	814	3-31-10	12,214	18.2%	22.2%	N/A
96	62	CHAMPION BANK	58362 CREVE COEUR	MO	4/30/10	PA	NM	1	FDIC	187,300	153,800	Protected	52,700	28.1%	34.3%	3,469	3-31-10	56,169	30.0%	36.5%	N/A
97	61	CF Bancorp	30005 TROY	MI	4/30/10	PA	NM	1	FDIC	1,650,000	1,430,000	Protected	615,300	37.3%	43.0%	(103,590)	3-31-10	511,710	31.0%	35.8%	3,677
98	60	WESTERN BANK PUERTO RICO	31027 MAYAGUEZ	PR	4/30/10	PA	NM	1	FDIC	11,940,000	8,620,000	Protected	3,310,000	27.7%	38.4%	376,622	3-31-10	3,686,622	30.9%	42.8%	177,448
99	59	R-G PREMIER BANK	32185 HAYTORY	PR	4/30/10	PA	NM	1	FDIC	5,920,000	4,250,000	Protected	2,330,000	20.8%	28.9%	219,797	3-31-10	1,449,797	24.5%	34.1%	\$970,077 million on 12-31-09
100	58	EUBANK	27150 SAN JUAN	PR	4/30/10	PA	NM	1	FDIC	2,560,000	1,970,000	Protected	743,000	29.1%	37.3%	106,974	3-31-10	844,874	33.0%	42.9%	\$213,199 million on 12-31-09
101	57	WHEATLAND BANK	58429 WHEATLAND	IL	4/23/10	PA	NM	1	FDIC	437,200	438,500	Protected	143,000	30.4%	30.8%	(10,986)	3-31-10	122,014	27.9%	27.8%	\$186,382 million on 12-31-09
102	56	PEOTONE BANK	10888 PEOTONE	IL	4/23/10	PA	NM	1	FDIC	130,200	127,000	Protected	31,700	24.3%	25.0%	305	3-31-10	32,005	24.6%	25.2%	N/A
103	55	LINCOLN PARK SAVINGS BANK	30600 CHICAGO	IL	4/23/10	PA	SSB	1	FDIC	199,900	171,500	Protected	48,400	24.2%	28.2%	2,865	3-31-10	51,265	25.6%	29.9%	N/A
104	54	NEW CENTURY BANK	34821 CHICAGO	IL	4/23/10	PA	NM	1	FDIC	485,600	492,000	Protected	125,300	25.8%	25.3%	4,475	3-31-10	129,775	26.7%	26.4%	N/A
105	53	CITIZENS BANK & TRUST COMPANY	34658 CHICAGO	IL	4/23/10	PA	NM	1	FDIC	77,300	74,500	Protected	20,900	27.0%	28.1%	422	3-31-10	21,322	27.6%	28.6%	N/A
106	52	BROADWAY BANK	22853 CHICAGO	IL	4/23/10	PA	NM	1	FDIC	1,200,000	994,300	Protected	394,300	32.9%	35.8%	28,386	3-31-10	422,686	35.2%	38.4%	14
107	51	AMCROW BANK, N.A.	3735 ROCKFORD	IL	4/23/10	PA	NM	1	FDIC	3,800,000	3,400,000	Protected	220,300	5.8%	6.5%	74,776	3-31-10	295,076	7.8%	8.7%	\$33,873 million on 9-30-09
108	50	CITY BANK	21521 LYNNWOOD	WA	4/16/10	PA	NM	1	FDIC	1,130,000	1,020,000	Protected	323,400	28.6%	31.7%	5,529	3-31-10	328,929	29.1%	32.2%	\$274,064 million on 12-31-09
109	49	TAMALPAIS BANK	31493 SAN RAFAEL	CA	4/16/10	PA	NM	1	FDIC	628,900	487,600	Protected	81,100	12.9%	16.6%	17,324	3-31-10	98,424	15.7%	20.2%	\$16,287 million on 12-31-09
110	48	INNOVATIVE BANK	23876 OAKLAND	CA	4/16/10	PA	NM	1	FDIC	268,900	225,200	Protected	37,800	14.1%	16.8%	13,749	3-31-10	51,549	19.2%	22.9%	N/A
111	47	BUTLER BANK	26619 LOWELL	MA	4/16/10	PA	NM	1	FDIC	268,000	233,200	Protected	22,900	8.5%	9.8%	(271)	3-31-10	22,629	8.4%	9.7%	N/A
112	46	RIVERSIDE NATIONAL BANK OF FLORIDA	24067 FORT PIERCE	FL	4/16/10	PA	NM	1	FDIC	3,420,000	2,760,000	Protected	491,800	14.4%	17.8%	(4,353)	3-31-10	487,447	14.3%	17.7%	174,344
113	45	FIRST FEDERAL BANK OF NORTH FLORIDA	57724 PALATKA	FL	4/16/10	PA	SA	1	OTS	393,300	324,200	Protected	6,000	1.5%	1.9%	6,252	3-31-10	12,252	3.1%	3.8%	N/A
114	44	AMERICAN FIRST BANK	28886 CLERMONT	FL	4/16/10	PA	NM	1	FDIC	90,500	81,900	Protected	10,500	11.6%	12.8%	373	12-31-09	10,873	12.0%	13.3%	N/A
115	43	LAKESHORE COMMUNITY BANK	34878 RTERLING HEIGHTS	MI	4/16/10	PO	NM	1	FDIC	51,000	52,300	NOT	11,200	21.1%	21.4%	429	3-31-10	11,629	21.9%	22.2%	N/A
116	42	BEACH FIRST NATIONAL BANK	34282 MYRTLE BEACH	SC	4/9/10	PA	NM	1	FDIC	585,100	516,000	Protected	130,300	22.3%	25.3%	8,064	3-31-10	138,364	23.6%	26.8%	N/A
117	41	DESERT HILLS BANK	57060 PHOENIX	AZ	3/26/10	PA	NM	1	FDIC	496,600	426,500	Protected	106,700	21.5%	25.0%	22,695	12-31-09	129,395	26.1%	30.3%	N/A
118	40	UNITY NATIONAL BANK	34678 CARTERSVILLE	GA	3/26/10	PA	NM	1	FDIC	292,200	264,300	Protected	67,200	23.0%	25.4%	9,050	12-31-09	76,250	26.1%	28.8%	N/A
119	39	KEY WEST BANK	32610 PA	FL	3/26/10	PA	SA	1	OTS	88,000	67,700	Protected	23,100	26.3%	34.1%	52	12-31-09	23,152	26.3%	34.2%	N/A

Line number	Year's failure number	Institution Name	City	State	Failure date	Transaction Type	Charter #	FDIC Regulator	Total assets	Per FDIC news release	Total deposits	Most recent estimated base ID	Uninsured deposits protected	Total assets	Total deposits	Last reported net worth Amount	Date	Differential: Last net worth - Est. net worth	Differential: Last deposit # - Est. deposit #	Estimated uninsured domestic deposits Reported at earlier date	
135	23	SUN AMERICAN BANK	27126 BOCA RATON	FL	3/5/10	PA	NM	1	FDIC	535,700	443,500	103,800	101,800	19,4%	23,4%	8,713	12-31-09	112,513	21,0%	25,4%	N/A
136	22	RAINIER PACIFIC BANK	38129 TACOMA	WA	2/26/10	PA	NM	1	FDIC	717,800	446,200	95,200	95,200	13,3%	21,3%	(11,085)	12-31-09	84,115	11,7%	18,9%	N/A
137	21	CARSON RIVER COMMUNITY BANK	58352 CARSON CITY	NV	2/26/10	PA	NM	1	FDIC	51,100	50,000	7,900	7,900	15,5%	15,8%	889	12-31-09	8,789	17,2%	17,6%	N/A
138	20	LA JOLLA BANK, FSB	32423 LA JOLLA	CA	2/19/10	PA	SA	1	OTS	3,600,000	2,800,000	852,300	852,300	23,7%	30,4%	28,506	12-31-09	880,806	24,5%	31,5%	\$457,112 million at 6-30-09
139	19	GEORGE WASHINGTON SAVINGS BANK	29952 ORLAND PARK	IL	2/19/10	PA	SSB	1	FDIC	412,800	397,000	141,400	141,400	34,3%	35,6%	13,727	12-31-09	155,127	37,6%	39,1%	N/A
140	18	LA COSTE NATIONAL BANK	3387 LA COSTE	TX	2/19/10	PA	N	1	OCC	53,900	49,300	3,700	3,700	6,9%	7,5%	4,229	12-31-09	7,929	14,7%	16,1%	N/A
141	17	MARCO COMMUNITY BANK	57586 MARCO ISLAND	FL	2/19/10	PA	SM	1	FRB	119,600	117,100	38,100	38,100	31,9%	32,5%	1,970	12-31-09	40,070	33,5%	34,2%	N/A
142	16	1ST AMERICAN STATE BANK	15448 HANCOCK	MN	2/15/10	PA	NM	1	FDIC	18,200	16,300	3,100	3,100	17,0%	19,0%	292	12-31-09	3,392	18,6%	20,8%	N/A
143	15	AMERICAN MARINE BANK	16730 BAINBRIDGE ISLAND	WA	1/29/10	PA	NM	1	FDIC	373,200	308,500	58,900	58,900	15,8%	19,1%	2,357	12-31-09	61,257	16,4%	19,9%	N/A
144	14	1ST REGIONAL BANK	23011 LOS ANGELES	CA	1/29/10	PA	NM	1	FDIC	2,180,000	1,870,000	825,500	825,500	37,9%	44,1%	120,282	12-31-09	945,782	43,9%	50,6%	\$456,974 million at 6-30-09
145	13	COMMUNITY BANK AND TRUST	5702 CORNELIA	GA	1/29/10	PA	NM	1	FDIC	1,210,000	1,110,000	354,500	354,500	29,3%	31,9%	18,886	12-31-09	373,386	30,9%	33,6%	\$194,702 million at 6-30-09
146	12	MARSHALL BANK, N.A.	16133 HALLOCK	MN	1/29/10	PA	N	1	OCC	59,900	54,700	4,100	4,100	6,8%	7,5%	11,652	12-31-09	15,752	26,3%	28,8%	N/A
147	11	FLORIDA COMMUNITY BANK	5672 MIAMIWALDEE	FL	1/29/10	PA	NM	1	FDIC	875,500	795,500	352,600	352,600	40,3%	44,3%	1,765	12-31-09	354,365	40,5%	44,5%	\$71,44 million at 6-30-09
148	10	FIRST NATIONAL BANK OF GEORGIA	16480 CARROLLTON	GA	1/29/10	PA	NM	1	OCC	832,600	757,900	260,400	260,400	31,3%	34,4%	236	12-31-09	260,636	31,3%	34,4%	N/A
149	9	COLUMBIA RIVER BANK	22469 THE DALLES	OR	1/29/10	PA	NM	1	FDIC	1,100,000	1,000,000	172,500	172,500	15,7%	17,3%	22,963	12-31-09	195,463	17,8%	19,5%	\$32,353 million at 6-30-09
150	8	EVERGREEN BANK	20501 SEATTLE	WA	1/22/10	PA	NM	1	FDIC	488,500	439,400	64,200	64,200	13,1%	14,6%	33,890	12-31-09	98,090	20,1%	22,3%	N/A
151	7	CHARTER BANK	32498 SANTA FE	NM	1/22/10	PA	SA	1	OTS	1,200,000	851,500	201,900	201,900	16,8%	23,7%	(27,809)	12-31-09	174,091	14,5%	20,4%	\$79,828 million at 6-30-09
152	6	BANK OF LEITON	8265 LEITON	MO	1/22/10	PA	NM	1	FDIC	20,100	20,400	8,100	8,100	40,3%	39,7%	(272)	12-31-09	7,828	38,9%	38,4%	N/A
153	5	PREMIER AMERICAN BANK	57147 MIAMI	FL	1/22/10	PA	NM	1	FDIC	350,900	326,300	85,000	85,000	24,2%	26,0%	24	12-31-09	85,024	24,2%	26,1%	N/A
154	4	BARNES BANKING COMPANY	1252 KAYSVILLE	UT	1/15/10	IDT	NM	1	FRB	827,800	786,500	271,300	271,300	32,8%	34,5%	6,130	12-31-09	277,430	33,5%	35,3%	100
155	3	STEPHEN STATE BANK	17522 ST. STEPHEN	MN	1/15/10	PA	NM	1	FDIC	24,700	23,400	7,200	7,200	29,1%	30,8%	(1,219)	12-31-09	5,981	24,2%	25,6%	N/A
156	2	TOWN COMMUNITY BANK	34705 ANTOCH	IL	1/15/10	PA	NM	1	FDIC	69,600	67,400	17,800	17,800	25,6%	26,4%	1,802	12-31-09	19,602	28,2%	29,1%	N/A
157	1	HORIZON BANK	22977 BELLINGHAM	WA	1/8/10	PA	NM	1	FDIC	1,000,000	1,000,000	539,100	539,100	41,5%	49,0%	11,923	12-31-09	551,023	42,4%	50,1%	\$218,253 million at 6-30-09
158	140	FIRST FEDERAL BANK OF CALIFORNIA	28356 SANTA MONICA	CA	12/18/09	PA	SA	1	OTS	6,100,000	4,500,000	1,601,950	1,601,950	2,6%	3,6%	261,240	9-30-09	421,435	6,9%	9,4%	\$469,555 million at 6-30-09
159	139	IMPERIAL CAPITAL BANK	26348 LA JOLLA	CA	12/18/09	PA	NM	1	FDIC	4,000,000	2,800,000	488,154	488,154	12,2%	17,4%	149,907	9-30-09	638,061	16,0%	22,8%	\$413,217 million at 6-30-09
160	138	INDEPENDENT BANKERS BANK	26820 SPRINGFIELD	IL	12/18/09	BB	SM	1	FRB	585,500	511,500	115,564	115,564	19,7%	22,6%	21,101	9-30-09	136,665	23,3%	26,7%	N/A
161	137	NEW SOUTH FEDERAL SAVINGS BANK	32276 RINDOLE	AL	12/18/09	PA	SA	1	OTS	1,500,000	1,200,000	224,030	224,030	14,9%	18,7%	2,620	9-30-09	226,650	15,1%	18,9%	N/A
162	136	CITIZENS STATE BANK	1006 NEW BALTIMORE	MI	12/18/09	IDT	NM	1	FDIC	168,600	157,100	33,980	33,980	20,2%	21,6%	1,930	9-30-09	35,910	21,3%	22,9%	\$10 million at 6-30-09
163	135	PEOPLES FIRST COMMUNITY BANK	32167 PANAMA CITY	FL	12/18/09	PA	SA	1	OTS	1,800,000	1,700,000	490,288	490,288	27,2%	28,8%	18,345	9-30-09	508,633	28,3%	29,9%	\$277,404 million at 6-30-09
164	134	ROCKBRIDGE COMMERCIAL BANK	58315 ATLANTA	GA	12/18/09	PO	NM	1	FDIC	294,000	291,700	101,073	101,073	34,4%	34,6%	1,334	9-30-09	102,607	34,9%	35,2%	2,100
165	133	SOLUTIONS BANK	4731 OVERLAND PARK	KS	12/11/09	PA	SM	1	FRB	511,100	421,300	115,435	115,435	22,6%	27,4%	15,833	9-30-09	131,268	25,7%	31,2%	N/A
166	132	VALLEY CAPITAL BANK, N.A.	58399 MESA	AZ	12/11/09	PA	N	1	OCC	40,300	41,300	9,900	9,900	24,6%	24,0%	(1,336)	9-30-09	8,564	21,3%	20,7%	N/A
167	131	REPUBLIC FEDERAL BANK, N.A.	22846 MIAMI	FL	12/11/09	PA	N	1	OCC	433,000	352,700	117,553	117,553	27,1%	33,3%	(14,510)	9-30-09	103,043	23,8%	29,2%	N/A
168	130	GREATER ATLANTIC BANK	32583 RESTON	VA	12/4/09	PA	SA	1	OTS	203,000	179,000	37,695	37,695	18,6%	21,1%	(1,678)	9-30-09	36,017	17,7%	20,1%	N/A
169	129	BENCHMARK BANK	10440 AURORA	IL	12/4/09	PA	NM	1	FDIC	170,000	181,000	72,009	72,009	42,4%	39,8%	(23,388)	9-30-09	48,621	28,6%	26,9%	N/A
170	128	AMTRUST BANK	29776 CLEVELAND	OH	12/4/09	PA	SA	1	OTS	12,000,000	8,000,000	2,362,365	2,362,365	19,7%	29,5%	276,456	9-30-09	2,638,821	22,0%	33,0%	\$841,82 million at 6-30-09
171	127	TATNALL BANK	12080 REIDSVILLE	GA	12/4/09	PA	NM	1	FDIC	49,600	47,300	17,481	17,481	35,2%	37,0%	18,277	9-30-09	36,879	38,6%	38,0%	N/A
172	126	FIRST SECURITY NATIONAL BANK	26290 NORICORAS	GA	12/4/09	PA	N	1	OCC	128,000	123,000	31,969	31,969	25,0%	26,0%	2,488	9-30-09	34,457	26,9%	28,0%	N/A
173	125	BUCKHEAD COMMUNITY BANK	34663 ATLANTA	GA	12/4/09	PA	NM	1	FDIC	874,000	838,000	242,617	242,617	27,8%	29,0%	8,638	9-30-09	251,255	28,7%	30,0%	N/A
174	124	COMMERCE BANK OF SOUTHWEST FLA	58016 FORT MYERS	FL	11/20/09	PA	NM	1	FDIC	79,700	76,700	28,663	28,663	36,0%	37,4%	(2,052)	9-30-09	26,611	33,4%	34,7%	N/A
175	123	OCEAN COAST NATIONAL BANK	57914 SAN CLEMENTE	CA	11/13/09	PA	N	1	OCC	134,400	130,900	32,230	32,230	24,0%	24,6%	2,050	9-30-09	34,280	25,5%	26,2%	N/A
176	122	PRICION BANK	22437 MAPLES	FL	11/13/09	PA	NM	1	FRB	2,700,000	2,100,000	693,193	693,193	24,2%	31,1%	64,282	9-30-09	717,675	32,4%	34,2%	\$698,317 million at 6-30-09
177	121	CENTURY BANK, FSB	32267 SARGASOTA	FL	11/13/09	PA	SA	1	OTS	728,000	631,000	282,730	282,730	38,8%	44,8%	(47,041)	9-30-09	235,689	46,4%	37,4%	N/A
178	120	UNITED COMMERCIAL BANK	32469 SAN FRANCISCO	CA	11/6/09	PA	NM	1	FDIC	11,200,000	7,500,000	1,504,899	1,504,899	13,4%	20,1%	308,509	9-30-09	1,813,408	16,2%	24,2%	\$3,980 billion at 6-30-09
179	119	GATEWAY BANK	19450 ST. LOUIS	MO	11/6/09	PA	NM	1	FDIC	27,700	27,900	11,777	11,777	42,5%	42,2%	(875)	9-30-09	10,902	39,4%	39,1%	N/A
180	118	PROSPERAN BANK	34734 OMAHA	NE	11/6/09	PA	NM	1	FDIC	199,500	175,600	54,173	54,173	27,2%	30,9%	(4,053)	9-30-09	50,120	25,1%	28,5%	N/A
181	117	HOME FEDERAL SAVINGS BANK	30329 DETROIT	MI	11/6/09	PA	SA	1	OTS	14,900	12,800	7,902	7,902	53,0%	61,7%	138	9-30-09	8,040	54,0%	62,8%	0
182	116	UNITED SECURITY BANK	22286 SPARTA	GA	11/6/09	PA	NM	1	FDIC	157,000	150,000	65,462	65,462	41,7%	43,6%	1,990	9-30-09	67,452	43,0%	45,0%	\$0 on 3-31-09
183	115	NORTH HOUSTON BANK	18776 HOUSTON	TX	10/30/09	PA	NM	1	FDIC	326,200	308,000	47,132	47,132	14,4%	15,3%	15,705	9-30-09	62,837	19,3%	20,4%	N/A
184	114	MADISONVILLE STATE BANK	33782 MADISONVILLE	TX	10/30/09	PA	NM	1	FDIC	256,700	225,200	27,604	27,604	10,8%	12,3%	19,451	9-30-09	47,055	18,3%	20,9%	N/A
185	113	CITIZENS NATIONAL BANK	25222 TEAGUE	TX	10/30/09	PA	N	1	OCC	118,200	97,700	24,931	24,931	21,1%	25,5%	10,061	9-30-09	34,992			

Line number	Year's failure number	Institution Name	City	St.	Failure date	Trans- action Type	Charter #	Primary Federal Regulator	Per FDIC-ins release Total assets	Total deposits	Most recent estimated loan (L)	Uninsured deposits protected?	Losses Total assets Total deposits	Last reported net worth Amount Date	Differential Last net worth - Est loss	Differential % Last deposit #	Estimated uninsured domestic deposits Reported at earlier date				
203	94	GEORGIAN BANK	ATLANTA	GA	9/25/09	PA	NM	1	2,000,000	2,000,000	889,244	Protected	44.5%	144,783	1,034,027	51.7%	463,365	N/A			
204	94	IRWIN UNION BANK, FSB	LOUISVILLE	KY	9/18/09	PA	SA	1	493,000	441,000	143,762	Protected	29.2%	41,289	630,000	37.5%	42.0%	N/A			
205	93	IRWIN UNION BANK AND TRUST CO.	COLUMBUS	IN	9/18/09	PA	NM	1	2,700,000	2,100,000	787,592	Protected	29.2%	157,451	630,000	35.0%	45.0%	N/A			
206	92	VENTURE BANK	LACY	WA	9/11/09	PA	NM	1	970,000	903,000	262,383	Protected	27.0%	(8,552)	630,000	253,831	28.1%	374	\$486,147 million at 3-31-09		
207	91	BRICKWELL COMMUNITY BANK	WOODBURY	MN	9/11/09	PA	NM	1	72,000	63,000	27,097	Protected	37.6%	(744)	630,000	26,353	26.2%	N/R	\$12,442 million at 3-31-09		
208	90	CORBUS BANK	CHICAGO	IL	9/11/09	PA	N	1	7,000,000	7,000,000	965,511	Protected	13.8%	(161,976)	630,000	803,535	11.5%	577,033	\$576,649 million at 3-31-09		
209	89	FIRST STATE BANK	FLAGSTAFF	AZ	9/4/09	PA	NM	1	105,000	95,000	48,739	Protected	46.4%	4,996	630,000	53,235	50.7%	N/R	N/A		
210	88	PLATINUM COMMUNITY BANK	ROLLING MEADOWS	IL	9/4/09	PO	SA	1	345,600	305,000	97,473	NOT	28.2%	35,581	630,000	131,054	38.5%	43.6%	N/A		
211	87	VANTUS BANK	SILOU CITY	IA	9/4/09	PA	SA	1	438,000	368,000	100,491	Protected	21.9%	2,663	630,000	103,154	22.5%	N/R	N/A		
212	86	INBANK	CAN FOREST	IL	9/4/09	PA	NM	1	212,000	199,000	56,982	Protected	26.9%	(1,174)	630,000	55,808	26.3%	28.0%	N/A		
213	85	FIRST BANK OF KANSAS CITY	KANSAS CITY	MO	9/4/09	PA	NM	1	16,000	15,000	7,244	Protected	45.3%	309	630,000	7,553	47.2%	50.4%	N/A		
214	84	AFFINITY BANK	VENTURA	CA	8/28/09	PA	NM	1	1,000,000	922,000	269,524	Protected	27.0%	8,208	630,000	277,732	27.8%	30.1%	N/A		
215	83	MAIN STREET BANK	FOREST LAKE	MN	8/28/09	PA	NM	1	459,000	434,000	98,387	Protected	21.4%	(5,077)	630,000	93,310	20.3%	21.5%	\$182,799 million at 3-31-09		
216	82	BRADFORD BANK, FSB	BALTIMORE	MD	8/28/09	PA	SA	1	452,000	383,000	92,422	Protected	20.4%	1,685	630,000	94,107	20.8%	24.6%	N/A		
217	81	GUARANTY BANK	AUSTIN	TX	8/21/09	PA	SA	1	13,000,000	12,000,000	2,906,959	Protected	22.4%	(690,038)	630,000	2,216,921	17.1%	1,546,018	\$2,101 billion at 3-31-09		
218	80	CAPITAL SOUTH	BIRMINGHAM	AL	8/21/09	PA	SM	1	617,000	546,000	167,181	Protected	27.1%	30.6%	630,000	174,007	28.2%	31.9%	N/R	N/A	
219	79	FIRST COWETA	NEWMAN	GA	8/21/09	PA	SA	1	167,000	155,000	50,501	Protected	30.2%	3,307	630,000	53,808	32.2%	34.7%	N/R	N/A	
220	78	IBANK	ATLANTA	GA	8/21/09	PA	NM	1	143,000	130,000	68,317	Protected	47.8%	2,575	630,000	70,892	49.6%	54.5%	N/A		
221	77	COMMUNITY BANK OF NEVADA	LAS VEGAS	NV	8/14/09	PO	SM	1	1,520,000	1,380,000	757,071	NOT	49.8%	878	630,000	757,949	49.9%	54.9%	\$27,206 million at 3-31-09		
222	76	COMMUNITY BANK OF ARIZONA	PHOENIX	AZ	8/14/09	PA	NM	1	138,500	143,800	28,421	Protected	17.9%	19.8%	630,000	13,572	630,000	41,993	26.5%	29.2%	N/A
223	75	UNION BANK OF ARIZONA, NA	GILBERT	AZ	8/14/09	PA	NM	1	124,000	112,000	53,021	Protected	42.8%	47.3%	630,000	57,812	46.6%	51.6%	N/A		
224	74	COLONIAL BANK	MONTGOMERY	AL	8/14/09	PA	NM	1	25,000,000	20,000,000	4,016,000	Protected	16.1%	914,497	630,000	4,930,497	17.7%	24.7%	\$4,803 billion at 3-31-09		
225	73	DWELLING HOUSE S&L	PITTSBURGH	PA	8/14/09	PA	SA	1	13,400	13,800	9,722	Protected	72.6%	70.4%	630,000	9,320	69.6%	67.5%	N/A		
226	72	COMMUNITY FIRST BANK	PRINCEVILLE	OR	8/7/09	PA	SM	1	209,000	182,000	61,205	Protected	29.3%	33.6%	630,000	60,263	28.8%	33.1%	N/A		
227	71	COMMUNITY NB OF SARASOTA COUNTY	VENICE	FL	8/7/09	PA	N	1	97,000	93,000	27,376	Protected	28.2%	29.4%	630,000	26,255	27.4%	28.6%	N/A		
228	70	FIRST STATE BANK	SARASOTA	FL	8/7/09	PA	NM	1	463,000	387,000	124,608	Protected	26.9%	32.2%	630,000	5,520	630,000	130,128	28.1%	33.6%	N/A
229	69	MUTUAL BANK	HARVEY	LA	7/31/09	PA	NM	1	1,600,000	1,600,000	658,108	Protected	41.1%	41.1%	630,000	(26)	41.1%	2,308	\$164,65 million at 3-31-09		
230	68	FIRST BANK/AMERICANO	ELIZABETH	NJ	7/31/09	PA	NM	1	166,000	157,000	16,408	Protected	9.9%	10.5%	630,000	18,083	10.9%	11.5%	N/R	N/A	
231	67	PEOPLES COMMUNITY BANK	WEST CHESTER	OH	7/31/09	PA	SA	1	705,800	598,200	135,653	Protected	19.2%	22.7%	630,000	140,239	19.9%	23.4%	27,050	\$37,40 million at 12-31-08	
232	66	INTEGRITY BANK	JUPITER	FL	7/31/09	PA	NM	1	119,000	102,000	38,418	Protected	32.3%	37.7%	630,000	37,265	31.5%	36.5%	N/R	N/A	
233	65	FIRST STATE BANK OF ALTUS	ALTUS	OK	7/31/09	PA	NM	1	103,400	98,200	18,541	Protected	17.9%	18.9%	630,000	10,786	10.4%	11.0%	N/R	N/A	
234	64	SECURITY BANK OF JONES COUNTY	GRAY	GA	7/24/09	PA	NM	1	433,000	387,000	62,552	Protected	13.8%	16.2%	630,000	79,880	17.6%	20.6%	N/R	N/A	
235	63	SECURITY BANK OF HOUSTON COUNTY	PERRY	GA	7/24/09	PA	NM	1	383,000	320,000	45,391	Protected	11.9%	14.2%	630,000	61,022	15.9%	19.1%	N/R	N/A	
236	62	SECURITY BANK OF BIBB COUNTY	MACON	GA	7/24/09	PA	NM	1	1,200,000	1,000,000	385,314	Protected	32.1%	38.5%	630,000	408,823	34.9%	40.9%	3,054	\$125.24 million on 12-31-08	
237	61	SECURITY BANK OF NORTH METRO	WOODSTOCK	GA	7/24/09	PA	NM	1	224,000	212,000	72,471	Protected	32.4%	34.2%	630,000	67,096	30.0%	31.6%	N/R	N/A	
238	60	SECURITY BANK OF NORTH FULTON	ALPHARETTA	GA	7/24/09	PA	NM	1	209,000	191,000	41,457	Protected	19.8%	21.7%	630,000	42,972	20.6%	22.5%	N/R	N/A	
239	59	SECURITY BANK OF GWINNETT COUNTY	SUNAWEE	GA	7/24/09	PA	NM	1	322,000	292,000	154,055	Protected	47.8%	52.8%	630,000	133,173	41.4%	45.6%	N/R	N/A	
240	58	WATERFORD VILLAGE BANK	WILLIAMSVILLE	NY	7/24/09	PA	NM	1	61,400	58,000	12,154	Protected	19.8%	21.0%	630,000	11,469	18.7%	19.8%	N/A	N/A	
241	57	TEMBECULA VALLEY BANK	TEMBECULA	CA	7/17/09	PA	NM	1	1,500,000	1,300,000	389,080	Protected	25.9%	29.9%	630,000	410,456	27.4%	31.6%	449,508	\$445.45 million on 12-31-08	
242	56	VINEYARD COMMUNITY BANK, N.A.	RAMONA	CA	7/17/09	PA	N	1	1,900,000	1,600,000	578,725	Protected	30.5%	36.2%	630,000	560,760	29.5%	35.0%	322,143	\$320.89 million on 12-31-08	
243	55	BANKFIRST	BIQU FALLS	SD	7/17/09	PA	SM	1	275,000	254,000	78,493	Protected	28.5%	30.9%	630,000	53,718	19.5%	21.1%	N/R	N/A	
244	54	FIRST PIEDMONT BANK	WINNER	GA	7/17/09	PA	NM	1	115,000	109,000	31,994	Protected	27.8%	29.4%	630,000	35,104	30.5%	32.2%	N/R	N/A	
245	53	BANK OF WYOMING	THERMOPOLIS	WY	7/10/09	PA	NM	1	67,000	67,000	31,910	Protected	45.6%	47.6%	630,000	3,101	50.0%	52.3%	N/R	N/A	
246	52	FOUNDERS BANK	MORRIS	IL	7/20/09	PA	NM	1	962,500	848,900	141,586	Protected	14.7%	16.7%	630,000	160,642	16.7%	18.9%	N/R	N/A	
247	51	MILLENNIUM STATE BANK	DALLAS	TX	7/20/09	PA	NM	1	118,000	115,000	51,863	Protected	44.0%	45.1%	630,000	52,605	44.6%	45.7%	N/R	N/A	
248	50	FIRST NATIONAL BANK OF DANVILLE	DANVILLE	IL	7/20/09	PA	N	1	166,000	147,000	25,564	Protected	15.4%	17.4%	630,000	29,267	17.6%	19.9%	N/R	N/A	
249	49	ELIZABETH STATE BANK	ELIZABETH	IL	7/20/09	PA	NM	1	55,500	50,400	12,356	Protected	22.3%	24.5%	630,000	864	630,000	13,220	23.8%	26.2%	N/A
250	48	ROCK RIVER BANK	OREGON	IL	7/20/09	PA	NM	1	77,000	75,800	25,227	Protected	32.8%	33.3%	630,000	24,833	32.3%	32.8%	N/R	N/A	
251	47	FIRST STATE BANK OF WINCHESTER	WINCHESTER	IL	7/20/09	PA	NM	1	36,000	34,000	7,658	Protected	21.3%	22.5%	630,000	6,810	18.9%	20.0%	N/R	N/A	
252	46	JOHN WARNER BANK	CLINTON	IL	7/20/09	PA	NM	1	70,000	64,000	13,730	Protected	19.6%	21.5%	630,000	15,119	21.6%	23.6%	N/R	N/A	
253	45	MIRAE BANK	LOS ANGELES	CA	6/26/09	PA	NM	1	456,000	362,000	60,912	Protected	13.4%	16.8%	630,000	76,490	16.8%	21.1%	N/A	1,100	
254	44	METROPACIFIC BANK	IRVINE	CA	6/26/09	PA	NM	1	80,000	73,000	32,368	Protected	40.5%	44.3%	630,000	35,086	43.9%	48.1%	N/R	N/A	
255	43	HORIZON BANK	PINE CITY	MN	6/26/09	PA	NM	1	87,600	69,400	23,135	Protected	26.4%	33.3%	630,000	1,082	33.1%	34.9%	N/R	N/A	
256	42	NEIGHBORHOOD COMMUNITY BANK	NEWMAN	GA	6/26/09	PA	SM	1	221,600	191,300	70,796	Protected	31.9%	37.0%	630,000	76,056	34.3%	39.8%	N/R	N/A	
257	41	COMMUNITY BANK OF WEST GA	VILLA RICA	GA	6/26/09	PO	SM	1	199,400	182,500	86,244	NOT	43.3%	47.3%	630,000	7,303	46.9%	51.3%	N/R	N/A	
258	40	FIRST NATIONAL BANK OF ANTHONY	ANTHONY	KS	6/19/09	PA	N	1	156,900	142,500	34,331	Protected	21.9%	24.1%	630,000	3,522	34.1%	36.6%	N/R	N/A	
259	39	COOPERATIVE BANK	WILMINGTON	NC	6/19/09	PA	NM	1	970,000	774,000	271,904	Protected	28.0%	35.1%	630,000	307,953	31.7%	39.8%	N/R	N/A	
260	38	SOUTHERN COMMUNITY BANK	PAYETTEVILLE	GA	6/19/09	PA	NM														

Line number	Year's failure number	Institution Name	City	State	Failure date	Trans-action Type	Char-acter	Federal #	FDIC Regulating	Total assets	For FDIC news release	Total deposits	Most recent estimated loss (1)	Uninsured deposits protected (1)	Total assets	Losses/ deposits	Last reported net worth	Differential +/last net worth	Differential % asset #	Last deposit #	Estimated uninsured domestic deposits at closing	Reported at earlier date
271	27	MICHIGAN HERITAGE BANK	34569 FARMINGTON HILLS	MI	4/24/09	PA	SM	1	FRB	184,600	151,700	58,377	Protected	31.6%	38.5%	5,931	64,308	34.8%	42.4%	N/R	N/A	
272	26	AMERICAN SOUTHERN BANK	57943 KENNESAW	GA	4/24/09	PA	NM	1	FDIC	112,300	104,300	36,498	Protected	32.5%	35.0%	(307)	36,191	32.2%	34.7%	N/R	N/A	
273	25	GREAT BASIN BANK	33824 ELKO	NV	4/17/09	PA	NM	1	FDIC	270,900	221,400	20,917	Protected	7.7%	9.4%	7,300	28,217	10.4%	12.7%	N/R	N/A	
274	24	AMERICAN STERLING BANK	8266 SUGAR CREEK	MO	4/17/09	PA	SA	1	OTS	181,000	171,900	46,220	Protected	25.5%	26.9%	(13,660)	32,560	18.0%	18.9%	N/R	N/A	
275	23	NEW FRONTIER BANK	34881 GREELEY	CO	4/10/09	PA	SA	1	FDIC	2,000,000	1,500,000	863,064	NOT	43.2%	57.5%	60,509	923,573	46.2%	61.6%	231,330	4,000	\$12,159 million on 6-30-08
276	22	CAPE FEAR BANK	34659 WILMINGTON	NC	4/10/09	PA	NM	1	FDIC	492,000	403,000	126,649	Protected	25.7%	31.4%	29,632	156,281	31.8%	38.8%	N/R	N/A	
277	21	OMNI NATIONAL BANK	22238 ATLANTA	GA	3/27/09	IDT	N	1	OCC	956,000	796,800	342,375	NOT	35.8%	43.0%	48,869	391,244	40.9%	49.1%	N/R	2,000	
278	20	TEMBANK, NA	4754 PAOLA	KS	3/20/09	PA	N	1	OCC	669,800	492,800	118,624	Protected	17.7%	24.1%	30,488	149,112	22.3%	30.3%	N/R	N/A	
279	19	COLORADO NATIONAL BANK	18896 COLO SPRINGS	CO	3/20/09	PA	N	1	OCC	123,500	82,700	16,118	Protected	13.1%	19.5%	7,938	23,516	19.0%	28.4%	N/R	N/A	
280	18	FIRSTCITY BANK	18243 STOCKBRIDGE	GA	3/20/09	PO	NM	1	FDIC	297,000	278,000	122,787	NOT	41.3%	44.2%	14,974	137,761	46.4%	49.6%	N/R	N/A	
281	17	FREEDOM BANK OF GEORGIA	57558 COMMERCE	GA	3/6/09	PA	NM	1	FDIC	173,000	161,000	40,143	Protected	23.2%	24.9%	4,620	44,763	25.9%	27.8%	N/R	778	
282	16	SECURITY SAVINGS BANK	34820 HENDERSON	NV	2/27/09	PA	NM	1	FDIC	271,800	234,400	79,746	Protected	29.3%	34.0%	8,828	88,574	32.6%	37.8%	N/R	N/A	
283	15	HERITAGE COMMUNITY BANK	20078 GLENWOOD	IL	2/27/09	PA	NM	1	FDIC	539,000	424,000	204,730	Protected	38.0%	48.3%	(2,595)	202,135	37.5%	47.7%	N/R	N/A	
284	14	SILVER FALLS BANK	35395 SILVERTON	OR	2/20/09	PA	NM	1	FDIC	232,900	218,600	41,062	Protected	17.6%	18.8%	4,876	45,938	19.7%	21.0%	N/R	N/A	
285	13	PINNACLE BANK	57442 BEAVERTON	OR	2/13/09	PA	NM	1	FDIC	131,400	116,300	52,716	Protected	40.1%	45.3%	2,885	55,601	42.3%	47.8%	N/R	N/A	
286	12	CORN BELT BANK AND TRUST CO	16500 PITTSFIELD	IL	2/13/09	PA	NM	1	FDIC	73,000	64,000	15,668	Protected	21.5%	24.5%	5,964	21,632	29.6%	33.8%	N/R	N/A	
287	11	RIVERSIDE BANK OF THE GULF COAST	34563 CAPE CORAL	FL	2/13/09	PA	SM	1	FRB	271,800	209,000	79,746	Protected	29.3%	34.0%	8,828	88,574	32.6%	37.8%	N/R	N/A	
288	10	SIEBMAN COUNTY BANK	30155 LOUP CITY	NE	2/13/09	PA	NM	1	FDIC	539,000	424,000	204,730	Protected	38.0%	48.3%	(2,595)	202,135	37.5%	47.7%	N/R	N/A	
289	9	COUNTY BANK	22574 MERGED	CA	2/6/09	PA	SM	1	FRB	1,700,000	1,300,000	45,452	Protected	35.0%	53.4%	10,915	56,367	43.4%	66.2%	N/A	N/A	
290	8	ALLIANCE BANK	23124 CULVER CITY	CA	2/6/09	PA	NM	1	FRB	1,400,000	951,000	141,638	Protected	8.3%	10.9%	61,722	203,360	12.0%	15.6%	104,714	N/A	
291	7	FIRSTBANK FINANCIAL SERVICES	57017 MCDONOUGH	GA	2/6/09	PA	NM	1	FDIC	337,000	275,000	226,041	Protected	19.8%	23.8%	17,195	243,236	21.3%	25.6%	N/R	N/A	
292	6	OCALA NATIONAL BANK	26538 OCALA	FL	1/30/09	PA	N	1	OCC	232,500	209,200	93,239	Protected	37.5%	45.3%	8,169	134,463	39.9%	48.2%	N/R	N/A	
293	5	SUBURBAN FEDERAL SAVINGS BANK	30763 CROFTON	MD	1/30/09	PA	SA	1	OTS	360,000	302,000	109,442	Protected	30.4%	36.2%	(1,985)	107,457	29.8%	35.6%	N/R	N/A	
294	4	MAGNET BANK	58001 SALT LAKE CITY	UT	1/30/09	PO	NM	1	FDIC	292,900	282,900	155,393	NOT	53.1%	54.9%	15,895	171,288	58.5%	60.6%	N/R	N/A	0
295	3	1ST CENTENNIAL BANK	33023 REDLANDS	CA	1/23/09	PI	NM	1	FDIC	803,300	676,900	163,235	NOT	20.3%	24.9%	11,048	174,283	21.7%	25.7%	N/R	12,800	
296	2	BANK OF CLARK COUNTY	34959 VANCOUVER	WA	1/16/09	PI	NM	1	FDIC	446,500	366,500	151,433	NOT	33.9%	41.3%	19,331	170,764	38.2%	46.6%	N/R	39,300	
297	1	NATIONAL BANK OF COMMERCE	19733 BENGLEY	IL	1/16/09	PI	N	1	OCC	402,100	402,100	92,068	Protected	21.4%	22.9%	3,520	95,588	22.2%	23.8%	N/R	N/A	
298	25	SANDERSON STATE BANK	11568 SANDERSON	TX	12/22/08	PA(1)	NM	1	FDIC	37,900	27,900	11,831	Protected	32.0%	42.4%	4,161	15,992	43.2%	57.3%	N/R	N/A	
299	24	HAVEN TRUST BANK	35379 DULUTH	GA	12/22/08	PA(1)	NM	1	FDIC	572,000	515,000	236,079	Protected	41.3%	45.8%	24,824	260,903	45.6%	50.7%	N/R	N/A	
300	23	FIRST GEORGIA COMMUNITY BANK	34301 JACKSON	GA	12/22/08	PA(1)	SM	1	FRB	237,500	197,400	70,481	Protected	29.7%	35.7%	15,711	86,192	36.3%	43.7%	N/R	N/A	
301	22	THE COMMUNITY BANK	16490 LOGANVILLE	GA	11/21/08	PA	NM	1	FDIC	681,000	611,400	277,518	Protected	40.8%	45.4%	22,653	300,171	44.1%	49.1%	N/R	N/A	
302	21	PEF BANK & TRUST	28344 POMONA	CA	11/21/08	PA	SA	1	OTS	3,700,000	2,400,000	820,400	Protected	22.2%	34.2%	169,889	990,289	26.8%	41.3%	635,916	N/A	
303	20	DOWNY SAVINGS AND LOAN, F.A.	30968 NEWPORT BEACH	CA	11/21/08	PA	SA	1	OTS	12,800,000	9,700,000	1,332,965	Protected	10.4%	13.7%	958,298	2,291,263	17.9%	23.6%	883,631	N/A	
304	19	SECURITY PACIFIC BANK	23595 SAN DIEGO	CA	11/17/08	PA	NM	1	FDIC	561,100	450,100	145,948	Protected	26.0%	32.4%	18,171	164,119	29.2%	36.5%	N/A	N/A	
305	18	FRANKLIN BANK, SSB	26870 HOUSTON	TX	11/17/08	PA	SSB	1	FDIC	5,100,000	3,700,000	840,645	Protected	16.5%	22.7%	175,121	1,015,766	19.9%	27.5%	450,900	N/A	
306	17	FREEDOM BANK	57930 BRADENTON	FL	10/31/08	PA	NM	1	FDIC	287,000	254,000	109,490	Protected	38.1%	43.1%	10,069	119,559	41.7%	47.1%	N/A	N/A	
307	16	ALPHA BANK & TRUST	58241 ALPHARETTA	GA	10/24/08	PI	NM	1	FDIC	354,100	346,200	193,517	NOT	54.7%	55.9%	5,286	198,803	56.1%	57.4%	0	3,100 \$0 on 6-30-08	
308	15	MAIN STREET BANK	57654 NORTHVILLE	MI	10/10/08	PA	NM	1	FDIC	98,000	86,000	54,431	Protected	55.5%	63.3%	2,797	57,228	58.4%	66.5%	N/R	N/A	
309	14	MERIDIAN BANK	13789 ELDRED	IL	10/10/08	PA	NM	1	FDIC	39,180	36,880	18,811	Protected	48.0%	51.0%	1,878	20,689	52.8%	56.1%	N/R	N/A	
310	13	WASHINGTON MUTUAL BANK	32633 HENDERSON	NV	9/25/08	PA	SA	1	OTS	307,000,000	188,000,000	0	Protected	36.6%	37.3%	2,734	40,781	39.2%	40.0%	N/A	N/A	
311	12	AMERIBANK, INC.	6782 NORFOLK	WV	9/19/08	PI	SA	1	OTS	104,000	102,000	38,047	Protected	36.6%	37.3%	2,734	40,781	39.2%	40.0%	N/A	N/A	
312	11	SILVER STATE BANK	34194 HENDERSON	NV	9/5/08	PI	NM	1	FDIC	2,000,000	1,700,000	650,092 (6)	NOT	32.5%	38.2%	134,516	784,608	39.2%	46.2%	387,126	20,000	
313	10	INTEGRITY BANK	35469 ALPHARETTA	GA	8/29/08	PA	NM	1	FDIC	1,100,000	974,000	393,377	Protected	35.8%	40.4%	34,323	427,700	38.9%	43.9%	55,134	N/A	
314	9	THE COLUMBIAN BANK AND TRUST	22728 TOPEKA	KS	8/22/08	PI	NM	1	FDIC	752,000	622,000	297,967 (6)	NOT	39.6%	47.9%	43,538	341,505	45.4%	54.9%	46,000	N/A	
315	8	FIRST PRIORITY BANK	57523 BRADENTON	FL	8/17/08	PI	NM	1	FDIC	259,000	227,000	92,394 (6)	NOT	35.7%	40.7%	1,511	93,905	36.3%	41.4%	N/R	13,000	
316	7	FIRST HERITAGE BANK N.A.	57961 NEWPORT BEACH	CA	7/25/08	PA	N	1	OCC	254,000	233,000	41,968	Protected	16.5%	18.0%	15,905	57,873	22.8%	24.8%	N/A	N/A	
317	6	FIRST NATIONAL BANK OF NEVADA	27011 RENO	NV	7/25/08	PA	N	1	OCC	3,400,000	3,000,000	604,018	Protected	17.8%	20.1%	218,065	822,083	24.2%	27.4%	516,541	N/A	
318	5	INDYMAC BANK F.S.B	29730 PASADENA	CA	7/11/08	PI	SA	1	OTS	23,500,000	6,400,000	12,747,078 (6)	NOT	54.2%	199.2%	1,143,344	13,890,422	59.1%	217.0%	2,607,545	1,000,000	
319	4	FIRST INTEGRITY BANK, N.A.	12736 STAPLES	MN	5/30/08	PA	N	1	OCC	54,700	50,300	11,054	Protected	20.2%	22.0%	332	11,386	20.8%	22.6%	N/R	N/A	
320	3	ANB FINANCIAL, N.A.	33901 BENTONVILLE	AR	5/9/08	PI	N	1	OCC	2,100,000	1,800,000	832,568 (6)	NOT	39.6%	46.3%	37,602	870,170	41.4%	48.3%	65,484	39,200	
321	2	HOME BANK	1971 HUME	MO	3/7/08	PA	N	1	FDIC	18,700	13,600	5,245 (6)	NOT	28.1%	38.6%	2,794	8,039	43.0%	59.1%	N/R	1,100	
322	1	DOUGLASS NATIONAL BANK	24660 KANSAS CITY	MO	12/5/08	PA	N	1	OCC	58,500	53,800	6,465	Protected	11.1%	12.0%	1,190	7,655	13.1%	14.2%	N/R	N/A	
323	3	MIAMI VALLEY BANK	16848 LAKESIDE	OH	10/4/07	PI	NM	1	FDIC	86,700	76,000	26,690</										

Year's failure number	Institution Name	City	State	Failure date	Trans-action Type	Charter #	Primary Federal Regulator	For FDIC news release: Total assets	For FDIC news release: Total deposits	Most recent estimated loss (\$)	Uninsured deposits protected:	Low-risk Total assets	Low-risk Total deposits	Last reported net worth Amount	Date	Differential: Last net worth + Est. loss	Differential: Last asset #	Differential: Last deposit #	Estimated uninsured domestic deposits: Last reported	Estimated uninsured domestic deposits: Reported at earlier date
332					Totals: 1004	30		9,201,200	8,214,900	2,179,700	23,69%	26,53%	126,675			2,306,375	25,07%	28,08%		
333					Totals: 1003	41		14,363,500	12,651,200	2,385,200	16,61%	18,85%	273,040			2,658,240	18,51%	21,01%		
334					Totals: 1002	45		50,096,600	40,455,300	11,098,100	22,15%	27,43%	970,233			12,068,333	24,09%	29,83%		
335					Totals: 1001	41		22,852,700	19,802,100	6,480,200	28,36%	32,72%	310,091			6,790,291	29,71%	34,29%		
336					Totals: 2010	157		96,514,000	81,123,500	22,143,200	22,94%	27,30%	1,680,039			23,823,239	24,68%	29,37%		
337					Totals: 09Q4	45		66,109,400	49,771,900	10,361,526	15,67%	20,82%	2,118,302			12,479,828	18,88%	25,07%		
338					Totals: 09Q3	50		68,686,100	60,051,100	15,145,943	22,05%	25,22%	516,504			15,662,447	22,80%	26,08%		
339					Totals: 09Q2	24		26,545,300	19,633,300	9,459,533	35,64%	48,18%	(142,160)			9,317,393	35,10%	47,46%		
340					Totals: 09Q1	21		9,569,600	7,894,400	2,407,881	25,16%	30,50%	264,454			2,672,335	27,93%	33,85%		
341					Totals: 2009	140		170,910,400	137,350,700	37,374,904	21,87%	27,21%	2,757,100			40,132,004	23,48%	29,22%		
342					Totals: 2008	24		58,067,780	33,500,580	19,832,390	34,15%	59,20%	3,044,712			22,877,102	39,40%	68,29%		
343					Totals: 2007	3		2,602,500	2,389,200	210,735	8,10%	8,82%	71,511			282,246	10,85%	11,81%		
344					Totals, less WaMu	324	Totals	328,094,680	254,363,980	79,561,228	24,25%	31,28%	7,553,362			87,114,590	26,55%	34,25%		
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Results by regulator		Results by asset size		Protection of uninsured depositors since the IndyMac failure	
# of failures	% of loss	# of failures	% of loss	# of failures	% of loss
Agency		Asset size		Proceed	
FDIC	45.24%	<\$1 billion	22.75%	Yes	91.54%
OCC	11.47%	\$1-\$10 billion	34.79%	Not	8.46%
FRB	5.48%	>\$10 billion	42.46%	Totals	100.00%
All banks	62.20%	Totals	100.00%		
OTs	37.80%				
Totals, less WaMu	100.00%				
324	24.25%	324	24.25%	324	24.25%
Totals	24.25%	Totals	24.25%	Totals	24.25%

(1) The 2008 FDIC annual report classified these three failures as Purchase and Assumption -- Insured Deposits, but news release and receivership accounting show them to be Purchase & Assumptions -- All Deposits. The FDIC database of failed banks shows these three failures as P&As.

