Memorandum

July 18, 2019

TO: Public File – Advanced Notice of Proposed Rulemaking – Unsafe and Unsound

Banking Practices: Brokered Deposits and Interest Rate Restrictions - RIN 3064-

AE94

FROM: Nicholas J. Podsiadly

General Counsel

SUBJECT: July 16 Meeting with Representatives from TD Bank Group and TD Bank.

On July 16, 2019, staff from the Federal Deposit Insurance Corporation (FDIC) met with representatives from TD Bank Group and its subsidiary, TD Bank N.A., regarding certain matters related to the ANPR titled, Unsafe and Unsound Banking Practices: Brokered Deposits and Interest Rate Restrictions (ANPR), which was issued in the Federal Register on February 6, 2019. The issues discussed in the meeting involved the treatment of certain brokerage sweep deposits.

Representatives from TD Bank Group and TD Bank, N.A. were Ellen Patterson, Ellen Glaessner, and Philip Aquilino. Representatives from the FDIC included Andrea Toliver and Nicholas Podsiadly.