Fighting the Last War

Key References

Post-Mortem Reviews

FRB - Silicon Valley Bank (April 2023)

FDIC - Signature Bank (April 2023)

FDIC First Republic Bank (September 2023)

Responses:

Congress – Failed Bank Executive Clawback Act (proposed March 2023)

Interagency – Basel III End Game Proposal (July 2023)

Interagency – <u>Long Term Debt Proposal</u> (August 2023)

FDIC -- Proposal on Bank Mergers (March 2024)

OCC -- Proposal on Bank Mergers (January 2024)

Interagency -- Third Party Risk Management (June 2023)

FDIC-- Corporate Governance Proposal (September 2023)

OCC -- Acting Comptroller on Operational Resiliency (March 2024)

BaaS Enforcement Matters

OCC - Blue Bridge Bank Consent Order (January 2024)

FDIC - Lineage Bank (January 2024)

FDIC - Choice Financial Group (December 2023)

FDIC – First Fed Bank (November 2023)

OCC - <u>B2 Bank National Association</u> (October 2023)

OCC - <u>Vast Bank</u>, <u>National Association</u> (October 2023)

NYDFS – Metropolitan Commercial Bank (October 2023)

FRB – Metropolitan Commercial Bank (October 2023)

FDIC – Cross River Bank (March 2023)

OCC – <u>Blue Ridge Bank</u> (August 2022)

Industry Lawsuits Against Regulators

Community Reinvestment Act (February 2024)

Credit Card Late Fees (March 2024)