

REGISTERED LOBBYIST CONTACT DISCLOSURE FORM

This form is to be completed by Executive Branch employees who are contacted by registered lobbyists regarding EESA. This report includes a written description of each contact, the date and time of the contact, and the names of the registered lobbyist(s) and the employee(s) with whom the contact took place. Written materials prepared by registered lobbyists should be attached to this form for posting on the website. The information on this form will be available to the public on Treasury's website.

To be completed by the employee contacted			
Date and time of contact:	Name of the Employee(s) Contacted (Name and Title)	Brief description of the communication: (attach separate sheet if necessary)	
6/14/10, 3:30 PM	Lori Bettinger, Capital Purchase Program Director	Email about impact Collins amendment would have on a CPP institution	
Name of the Employee(s) who prepared this form:			Date
Lori Bettinger			6/17/10

Registered Lobbyist Name:	Title:	Firm or Organization:, if applicable	Client
Mark Tenhundfeld	Senior Vice President	American Bankers Association	

From: Mark Tenhundfeld
To: Schaffner, TedDisabled; Bettinger, Lori;
Subject: Impact of Collins amendment on [REDACTED]
Date: Monday, June 14, 2010 3:39:12 PM

Ted and Lori,

I wanted to share with you information that we have received from [REDACTED] about the potential impact that the Collins amendment would have on that institution (and on the industry broadly speaking). While I suspect you are all-too familiar with that amendment, in short it would require that the capital rules that currently apply to banks also apply to holding companies. Since, as we understand it, Treasury invested in [REDACTED], the investment would not count as Tier 1 capital going forward, with the results noted by [REDACTED] below. They have authorized us to share this information but I would request that you treat it confidentially. I simply wanted to make sure that Treasury was made aware of the potential impact on [REDACTED] as people within Treasury consider the Collins amendment. If you need further information, please let me know.

The Collins amendment, if implemented, could cause the demise of as many as 600 banks, as reported by Banc Investment Daily (May 24, 2010).

For [REDACTED], the removal of TruPS from our Tier 1 capital (as Collins mandates) would eliminate [REDACTED] million of capital. Such a move imperils our recapitalization efforts and raises serious questions about our ability to continue as a going concern.

Using information as of March 31, 2010, [REDACTED] Tier 1 capital would decline from [REDACTED] with TruPS to a critically undercapitalized level. Under those conditions, [REDACTED] would likely be closed, the FDIC would be faced with a Depositors Insurance Fund (DIF) expense in excess of [REDACTED], and the U.S. Treasury would face the loss of its [REDACTED] TARP investment.

Even if we were to succeed with our recapitalization, the loss of TruPS as required under Collins would cause us to reduce our loans (assets) by [REDACTED] and curtail new lending opportunities for our customers across the [REDACTED].

Thank you for your consideration of this information.

Best regards,

Mark

Mark Tenhundfeld
Senior Vice President
Office of Regulatory Policy
American Bankers Association
Building Success. Together.
202-663-5042

We are sending you this e-mail primarily for your information, to meet your needs and further our valued relationship. If you prefer not to receive any further messages from us, just reply to this e-mail and let us know. Thanks.

American Bankers Association 1120 Conn. Ave NW Wash DC 20036
