

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION**

CORNER POST, INC.,

Plaintiff,

v.

BOARD OF GOVERNORS OF THE FED-  
ERAL RESERVE SYSTEM,

Defendant.

Case No. 1:21-cv-95-DMT-CRH

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**PROPOSED INTERVENORS THE BANK POLICY INSTITUTE AND THE CLEARING  
HOUSE ASSOCIATION L.L.C.’S MOTION TO INTERVENE**

THE BANK POLICY INSTITUTE (“BPI”), a nonpartisan public policy, research, and advocacy organization, and THE CLEARING HOUSE ASSOCIATION L.L.C. (“TCH”), the nation’s oldest banking trade association, (collectively, “Proposed Intervenor”) hereby move the Court for an order granting leave to intervene in the above-captioned case.

This motion is based upon the declarations of John Court, Executive Vice President, General Counsel, and Chief Operating Officer of BPI; Stephanie Heller, Executive Vice President and General Counsel of TCH; and the memorandum of law submitted with this motion to intervene.

The movants respectfully request oral argument on this motion if it is opposed.

Dated: October 16, 2024

Respectfully submitted,

By: /s/ Noah A. Levine

**WILMER CUTLER PICKERING HALE  
AND DORR LLP**

Seth P. Waxman

seth.waxman@wilmerhale.com

2100 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
Tel: (202) 663-6000  
Fax: (202) 663-6363

Noah A. Levine  
noah.levine@wilmerhale.com  
7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
Tel: (212) 230-8800  
Fax: (212) 230-8888

*Attorneys for Proposed Intervenors*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2024, I filed the foregoing motion using the Court's CM/ECF system, which will send a notice of the filing to counsel for all parties.

/s/ Noah A. Levine  
Noah A. Levine

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**PROPOSED INTERVENORS THE BANK POLICY INSTITUTE AND THE CLEARING  
HOUSE ASSOCIATION L.L.C.'S MEMORANDUM OF LAW IN SUPPORT OF THEIR  
MOTION TO INTERVENE**

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## STATEMENT OF INTEREST

The Bank Policy Institute (“BPI”) and The Clearing House Association L.L.C. (“TCH”) (collectively, “Proposed Intervenor”) represent a substantial coalition of major nationwide banks. BPI and TCH are organizations headquartered in Washington, D.C. and New York, New York respectively. BPI is a nonpartisan public policy, research, and advocacy group that represents the policy interests of the nation’s leading banks. Declaration of John Court (“Court Decl.”) ¶ 2. TCH is the nation’s oldest banking association and represents the interests of its members by developing and promoting policies to support a safe, sound, and competitive banking system that serves customers, communities, and economic growth. Declaration of Stephanie Heller (“Heller Decl.”) ¶ 2. Proposed Intervenor’s members have a direct interest in this case, which concerns Regulation II,<sup>1</sup> a regulation promulgated over a decade ago by the Board of Governors of the Federal Reserve System (“the Board”) to regulate interchange fees received by debit-card issuing banks following Congress’s adoption of the Durbin Amendment. As described more fully in the accompanying declarations, Proposed Intervenor’s members include issuers of debit cards who receive debit card interchange fees and who are subject to Regulation II, and bank holding companies whose banks are such issuers. *See* Heller Decl. ¶¶ 4-6; Court Decl. ¶¶ 5-7. These issuers have collectively invested (and continue to invest) billions of dollars to develop and maintain an efficient, convenient, and secure debit card payments system.

Plaintiff asserts that Regulation II does not comport with the Durbin Amendment. Its challenge, if successful, would require the Board to issue a new rule that would dramatically reduce interchange fees. Vacating Regulation II, which has been the law of the land for more than a decade, would severely harm Proposed Intervenor, threatening their members’ ability to recover

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<sup>1</sup> 12 C.F.R. § 235 *et seq.*

a reasonable return on—indeed even the full *costs* of—enabling debit card transactions, as required by the Durbin Amendment.

Proposed Intervenorors thus seek to intervene in this case to defend against Plaintiff’s challenge to Regulation II. Because Proposed Intervenorors have standing and satisfy the requirements for both intervention as of right and for permissive intervention, the Court should permit intervention.<sup>2</sup>

## BACKGROUND

### I. Electronic Debit Transactions

This case concerns the Board’s regulation of debit card transactions, which are carried out by millions of American consumers every day as their primary method of payment. In 2021, 106 billion debit card transactions, totaling \$4.55 trillion in transaction value, were performed in the United States. *See* Board of Governors of the Federal Reserve System, *Federal Reserve Payment Study: 2022 Triennial Initial Data Release*, <https://tinyurl.com/3vwresvz> (last updated June 24, 2024). Since 2001, non-prepaid debit card transactions have increased more than any other non-cash payment type. *See id.*

The widespread use of debit cards by American consumers is due in large part to the investments made by financial institutions like Proposed Intervenorors’ members, who have worked to create a system that provides (1) inexpensive and effective electronic payment options to

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<sup>2</sup> The Eighth Circuit has held that a “statement of interest explaining why [the intervenor] seeks intervention” is sufficient to satisfy the requirement under Federal Rule of Civil Procedure 24(c) that a motion to intervene be “accompanied by a pleading,” where that statement, as this one, “provides sufficient notice to the court and the parties of [the intervenor]’s interests.” *United States v. Metro. St. Louis Sewer Dist.*, 569 F.3d 829, 834 (8th Cir. 2009); *see also ALPS Property & Cas. Ins. Co. v. Durick*, 2015 WL 12803618, at \*4 (D.N.D. Nov. 2, 2015) (similar). This precedent has particular salience given that Plaintiff concedes that even the Board need not file an Answer for the case to proceed. Dkt. 39 ¶ 4; Dkt. 41 ¶ 5.

consumers; (2) immediate, assured payments to merchants; and (3) an efficient, prompt, convenient, secure, and widely accepted method of payment. The costs related to debit card transactions have traditionally been recouped through interchange fees paid by merchants. Those fees compensate issuers for the substantial costs they incur in providing and maintaining a debit-card payment option; policing fraud related to debit card transactions; and authorizing, clearing, and settling debit card transactions. Merchants in this two-sided market realize substantial benefits from debit card transactions (including increased business from consumers and a safer and guaranteed form of payment) and pay interchange fees to help cover the costs of maintaining the debit card payment system.

## **II. The Durbin Amendment And Regulation II**

The Durbin Amendment was enacted as part of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, Pub. L. No. 111-203, § 1075, 124 Stat. 1376, 2068-2074 (2010). The guiding mandate under the Amendment is that “[t]he amount of any interchange transaction fee ... shall be reasonable and proportional to the cost incurred by the issuer with respect to the transaction.” 15 U.S.C. § 1693o-2(a)(2). To implement that mandate, the Amendment directed the Board, in turn, to “establish standards for assessing whether”—again, repeating the language of subsection (a)(2)—“the amount of any interchange transaction fee ... is reasonable and proportional to the cost incurred by the issuer with respect to the transaction.” *Id.* § 1693o-2(a)(3)(A). The Amendment also authorized the Board to provide for a fraud-prevention adjustment to the amount of any interchange transaction fee, subject to the issuer’s compliance with fraud-prevention standards established by the Board. *Id.* § 1693o-2(a)(5)(A). Finally, the Amendment directed the Board, in issuing regulations, to “distinguish between” and consider certain subjects and costs and not to consider certain other costs. *Id.* § 1693o-2(a)(4).

In 2011, the Board issued a Final Rule—Regulation II—that imposed a cap on interchange fees consisting of a base component of no more than 21 cents; an *ad valorem* component of 5 basis points, multiplied by the value of the transaction; and a fraud-prevention adjustment of no more than 1 cent. *See* Debit Card Interchange Fees and Routing, 76 Fed. Reg. 43394 (July 20, 2011) (“2011 Final Rule”); Debit Card Interchange Fees and Routing, 76 Fed. Reg. 43478 (July 20, 2011) (interim final rule regarding fraud-prevention adjustment to interchange fees). To determine this interchange fee cap, the Board relied on data provided by covered issuers in a 2009 survey. 2011 Final Rule, 76 Fed. Reg. at 43397. The Board also revised its initial proposal based on the extensive feedback it received from over 11,000 commenters, including Proposed Intervenor TCH and other representatives of Proposed Intervenor’s members and their interests.<sup>3</sup>

### III. Challenges To The 2011 Final Rule

Shortly after the Board promulgated the 2011 Final Rule, several merchants and merchant trade groups challenged the rule under the Administrative Procedure Act (“APA”). *See NACS v. Bd. of Governors of Fed. Rsrv. Sys.* (“*NACS I*”), 958 F. Supp. 2d 95, 96 (D.D.C. 2013). As Plaintiff does again here, the *NACS* “plaintiffs assert[ed] that the Durbin Amendment limits the Board’s consideration of allowable costs to the ‘incremental cost’ of ‘authorization, clearance and settlement [ACS] of a particular electronic debit transaction,’ and that, by including [any] other costs in the fee standard, the Board ‘acted unreasonably and in excess of its statutory authority.’” *Id.*; *see also* Dkt. 19 ¶¶ 18, 66-67. The district court sided with the merchants, holding that the Durbin Amendment allowed the Board to consider only “[i]ncremental ACS costs of individual transactions incurred by issuers.” *Id.* at 105. Several organizations representing the interests of

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<sup>3</sup> BPI was formed in 2018 through the combination of TCH’s regulatory policy functions and the Financial Services Roundtable.

Proposed Intervenor members, including Proposed Intervenor TCH, participated as amici in the case.<sup>4</sup>

The D.C. Circuit reversed. *NACS v. Bd. of Governors of Fed. Rsrv. Sys.* (“*NACS II*”), 746 F.3d 474, 477 (D.C. Cir. 2014).<sup>5</sup> It held that the Board was statutorily permitted to consider costs beyond simply incremental ACS costs, upholding “the Board’s reasonable determination that the statute splits costs into three categories: (1) incremental ACS costs, which the Board must allow issuers to recover; (2) costs specific to a particular transaction, other than incremental ACS costs, which the Board may, but need not, allow issuers to recover; and (3) costs not specific to a particular transaction, which the Board may not allow issuers to recover.” *Id.* at 488. Again, on appeal, several organizations representing the interests of Proposed Intervenor members, including Proposed Intervenor TCH, participated as amici in the D.C. Circuit—filing a brief and participating in oral argument. *Id.* at 482.<sup>6</sup> The merchant trade groups sought certiorari in the Supreme Court, which denied the petition. *NACS v. Bd. of Governors of Fed. Rsrv. Sys.*, 574 U.S. 1121 (2015).

Plaintiff Corner Post now brings a strikingly similar challenge. Like the *NACS* plaintiffs, Corner Post makes the same arguments that “‘incremental costs’ are the *only* costs the Board can consider in setting interchange fees” and that “Regulation II invents a third category of costs” that the Board “claims discretion to include (and exclude) ... in setting an allowable interchange fee.” Dkt. 19 ¶¶ 66-67. Following remand from the Supreme Court and Eighth Circuit, this Court on

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<sup>4</sup> Amicus Br. of The Clearing House *et al.*, *NACS I*, 958 F. Supp. 2d (D.D.C. 2013) (1:11-cv-2075).

<sup>5</sup> The D.C. Circuit “remand[ed] one minor issue—the Board’s treatment of so-called transactions-monitoring costs—to the Board for further explanation.” *NACS II*, 746 F.3d at 477.

<sup>6</sup> Amicus Br. of The Clearing House *et al.*, *NACS II*, 746 F.3d 474 (D.C. Cir. 2014) (13-5270).

September 20, 2024, issued a scheduling order for summary judgment briefing—beginning with Plaintiff’s brief on November 15, 2024, followed by the Board’s brief on January 10, 2025. Dkt. 41.

#### **IV. Pending Rulemaking Proceedings Related to Regulation II**

The Board has announced plans to further revise Regulation II. Almost one year ago, on November 14, 2023, the Board issued a Notice of Proposed Rulemaking to update Regulation II in several ways. Debit Card Interchange Fees and Routing, 88 Fed. Reg. 78100, 78101 (Nov. 14, 2023) (“2023 NPRM”). On May 10, 2024, Proposed Intervenors, on behalf of their members and alongside other organizations with similar interests, submitted a comment letter detailing significant concerns with the Board’s proposal. *See* The Clearing House, *et al.*, Comment Letter Regarding Docket No. R-1818, RIN 7100-AG67; Debit Card Interchange Fees and Routing (May 10, 2024), <https://tinyurl.com/8fwkfvhr>. Merchant trade groups likewise filed comment letters on the proposed rule. *See, e.g.*, Merchants Payments Coalition, Comment Letter Regarding Docket No. R-1818, RIN 7100-AG67, Notice of Proposed Rulemaking: Debit Card Interchange Fees and Routing (May 10, 2024), <https://tinyurl.com/92kvbaek>; The Food Industry Association, Comment Letter Regarding Notice of Proposed Rulemaking: Debit Card Interchange Fees and Routing; Docket No. R-1818, RIN 7100-AG67 (May 10, 2024), <https://tinyurl.com/35s674br>.

The Board has indicated that it intends to take further action on its proposal in January 2025. Regulation II – Debit Card Interchange Fees and Routing, Office of Management and Budget (last accessed Oct. 15, 2024), <https://tinyurl.com/5n79tkpv>.

### **ARGUMENT**

The Court should permit intervention because Proposed Intervenors represent the financial institutions who are directly regulated by Regulation II. Proposed Intervenors’ members thus have concrete interests in Plaintiff’s efforts to eviscerate Regulation II—the regulation that determines

the interchange fee that Proposed Intervenors’ members receive from debit card transactions. Plaintiff seeks to force the Board to promulgate a new regulation that would substantially reduce interchange fees by improperly limiting the costs the Board considers when setting Regulation II’s interchange cap. Any rule promulgated under Plaintiff’s erroneous reading of the Durbin Amendment would ignore substantial and verifiable costs incurred by Proposed Intervenors’ members in providing for and processing debit card transactions in contravention of the Amendment. Proposed Intervenors have an obvious, direct interest in the result of such a challenge.

Further, the interests of Proposed Intervenors and their members will not be adequately represented by the Board. The Board, as a governmental entity, is tasked with the broad responsibility of executing the Durbin Amendment’s goals and is subject to potential shifts in policy—both of which make it impossible for the Board to adequately represent Proposed Intervenors’ narrow, direct interest in the outcome of this litigation. Proposed Intervenors are uniquely situated to defend their financial interests against Plaintiff’s challenge to the long-settled Regulation II.

Proposed Intervenors thus have standing and should be entitled to intervene as a matter of right under Federal Rule of Civil Procedure 24(a). In the alternative, Proposed Intervenors should be granted permission to intervene under Rule 24(b).

## **I. Proposed Intervenors Have Standing**

“[A] prospective intervenor must ‘establish Article III standing’” by demonstrating injury in fact, causation, and redressability. *National Parks Conservation Ass’n v. U.S. EPA*, 759 F.3d 969, 974 (8th Cir. 2014). Here, Proposed Intervenors have associational standing. “[A]n association has standing to bring suit on behalf of its members when ‘(a) its members would

otherwise have standing to sue in their own right; (b) the interests it seeks to protect are germane to the organization’s purpose; and (c) neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit.” *Kuehl v. Sellner*, 887 F.3d 845, 851 (8th Cir. 2018). Each requirement is met here.

Proposed Intervenor’s members—nearly all of whom are debit card issuers who are covered by Regulation II’s fee cap because they possess assets over \$10 billion or who are bank holding corporations whose banks are such issuers, *see* Heller Decl. ¶ 4; Court Decl. ¶ 5—would have standing in their own right to intervene against Plaintiff’s challenge. Those members include multiple issuers subject to Regulation II and their holding companies. Heller Decl. ¶¶ 4-5; Court Decl. ¶¶ 5-6. Plaintiff’s lawsuit contends that Proposed Intervenor’s members should be barred from recovering via interchange substantial, recognizable, and verifiable costs related to debit card transactions that the Board considered when determining the amount of permissible interchange fees. It is well settled that such imminent economic injury satisfies the injury-in-fact requirement. *See National Parks*, 759 F.3d at 975 (holding that likelihood of “direct financial harm” established injury in fact). Further, Proposed Intervenor and their members “can trace [their] injury to the [Board] through the would-be court order if [Plaintiff] obtain[s] relief.” *Id.* And Proposed Intervenor’s members’ injury “can be redressed” because Proposed Intervenor “seek to prevent” Plaintiff from obtaining an order vacating Regulation II and thus, if Proposed Intervenor “prevail[]” they would “avoid” the negative consequences that would otherwise result from Plaintiff’s challenge. *Id.* The identification of members facing such harm suffices to support the first prong of the associational standing inquiry. *See Christian Emps. All. v. U.S. Equal Opportunity Comm’n*, 2024 WL 935591, at \*4-5 (D.N.D. March 4, 2024); *Clean Water and Air Legacy, LLC v. Tofte Wastewater Treatment Assoc.*, 649 F. Supp. 3d 764, 771 (D. Minn. 2023).



The interests that Proposed Intervenor seek to protect are squarely within their organizations' purposes. As explained above, BPI is a nonpartisan public policy, research, and advocacy group that represents the policy interests of the nation's leading banks. Court Decl. ¶ 2. TCH is the nation's oldest banking association and represents the interests of its members by developing and promoting policies to support a safe, sound, and competitive banking system that serves customers, communities, and economic growth. Heller Decl. ¶ 2. Plaintiff's lawsuit challenges Regulation II and seeks a court order that would dramatically alter the fees that support the operation of the debit card payment system, an issue with stark consequences for Proposed Intervenor's members and the interests for which Proposed Intervenor routinely advocate.

Last, the legal questions related to the Board's statutory authority are not particularized to any member nor do they require any individualized proof. Independent participation is thus not required. *See Red River Freethinkers v. City of Fargo*, 679 F.3d 1015, 1022 (8th Cir. 2012); *Pharm. Rsch. & Mfrs. of Am. v. Williams*, 64 F.4th 932, 948 (8th Cir. 2023). Each member subject to Regulation II would be harmed if Plaintiff's challenge was successful because that challenge would deny recovery of categories of costs to all such members in the same way. Heller Decl. ¶¶ 5-6; Court Decl. ¶¶ 6-7.

## **II. Proposed Intervenor Are Entitled To Intervene As Of Right**

Rule 24(a) provides that "a court must permit anyone to intervene who: (1) files a timely motion to intervene; (2) claims an interest relating to the property or transaction that is the subject of the action; (3) is situated so that disposing of the action may, as a practical matter, impair or impede the movant's ability to protect that interest; and (4) is not adequately represented by the existing parties." *National Parks*, 759 F.3d at 975 (cleaned up). The Eighth Circuit has stated that

Rule 24 “should be construed liberally, with all ‘doubts resolved in favor of the proposed intervenor.’” *Id.* at 975. Each factor favors intervention here.

**A. Proposed Intervenors’ Motion Is Timely**

Courts consider four factors relevant to the timeliness of intervention: “(1) the extent the litigation has progressed at the time of the motion to intervene; (2) the prospective intervenor’s knowledge of the litigation; (3) the reason for the delay in seeking intervention; and (4) whether the delay in seeking intervention may prejudice the existing parties.” *In re Uponor, Inc., F1807 Plumbing Fittings Prods. Liab. Litig.*, 716 F.3d 1057, 1065 (8th Cir. 2013). Each factor supports the timeliness of Proposed Intervenors’ motion.

First, consideration of the merits of this litigation has not significantly progressed; indeed, it has not even begun. To date, the only issues that this Court (or any court) has considered is whether Plaintiff’s claims were barred by the statute of limitations. Following the Supreme Court’s ruling on that issue, the mandate was returned to this Court just over two months ago. The Court issued a scheduling order related to summary judgment briefing less than a month ago, following a court conference which counsel for Proposed Intervenors attended and at which counsel indicated that Proposed Intervenors would shortly seek to participate in the litigation in some capacity. The Board has not filed an answer in this litigation, given the extensive litigation over the statute-of-limitations issue. “[A]n application made before the existing parties have joined issue in the pleadings has been regarded as clearly timely[.]” *Wright & Miller, Fed. Prac. and Proc.* § 1916. This case has thus far been limited to preliminary issues unrelated to Proposed Intervenors’ interest in the litigation, further demonstrating the timeliness of intervention. *Cf. Idaho Farm Bureau Fed’n v. Babbitt*, 58 F.3d 1392, 1397 (9th Cir. 1995) (affirming determination of timeliness when motion was filed “before any hearings or rulings on substantive matters”).

The second and third factors similarly favor intervention. To be sure, Proposed Intervenor have been aware of this litigation given their (and their members') interests. But until last month, there were significant reasons to doubt that this litigation would proceed to the merits. Until the Supreme Court's decision, there remained a significant possibility that this case would be resolved on procedural grounds unrelated to the substance of Regulation II. *See Corner Post, Inc. v. Bd. of Governors of Fed. Rsrv. Sys.*, 144 S. Ct. 2440 (2024). And the Board's 2023 NPRM—which would supersede the 2011 Final Rule challenged here, *see* 2023 NPRM, 88 Fed. Reg. at 78100—gave ample reason to doubt that this challenge to the 2011 Final Rule would proceed to the merits, as opposed to being stayed pending the issuance of a new rule. The comment period for that NPRM ended on May 12, 2024, Debit Card Interchange Fees and Routing; Extension of Comment Period, 89 Fed. Reg. 5438 (Jan. 29, 2024), and the Board publicly indicated its intention to take further action on its proposal as soon as January 2025. Regulation II – Debit Card Interchange Fees and Routing, Office of Management and Budget (last accessed Oct. 15, 2024). <https://tinyurl.com/5n79tkpv>.

Once it became clear that this litigation would proceed to consideration of the merits of Plaintiff's claims, Proposed Intervenor moved diligently to participate in the case. Counsel for Proposed Intervenor attended the September 20, 2024, status conference and are filing this motion less than a month after the Court issued its scheduling order. Dkt. 41. Proposed Intervenor have been diligent in protecting their interests in this litigation and have timely moved for intervention.

Finally, neither party will be prejudiced by intervention at this juncture. Counsel for Plaintiff represented at the September 20, 2024, status hearing that this action concerns only a pure legal challenge related to the Board's statutory authority such that they did not even need a formal administrative record to be compiled. *See* Dkt. 39 at 2 (joint motion stating agreement to defer the

Board’s obligation to file the administrative record “[g]iven the nature of Corner Post’s claims”). As a result, the Court’s scheduling order at this time provides only for briefing of cross-motions for summary judgment. Proposed Intervenor are prepared to participate in that dispositive briefing consistent with the schedule this Court entered—either by the same date that the Board is scheduled to submit its cross-motion for summary judgment and opposition or at any other time ordered by this Court. Allowing Proposed Intervenor to participate in merits briefing on the same schedule that has already been entered will not prejudice any of the parties.

**B. Proposed Intervenor Possess Legally Protectable Interests**

For similar reasons to those supporting Proposed Intervenor’s standing to intervene on behalf of their members in this case, *supra* 7-9, Proposed Intervenor also have a “recognized interest in the subject matter of the litigation.” *National Parks*, 759 F.3d at 975. “When a third party files suit to compel governmental agency action that would directly harm a regulated company, the company’s economic interests in the lawsuit satisfy Rule 24(a)(2)’s recognized-interest requirement.” *Id.* at 976. Here, Plaintiff seeks to compel the Board to vacate its long-settled approach to Regulation II and substantially reduce the interchange fees permitted under the rule. In other words, Proposed Intervenor’s members’ “interests are the ultimate target” and therefore Proposed Intervenor, on behalf of their members, have “a recognized interest in this dispute sufficient to satisfy Rule 24(a)(2).” *Id.*

**C. Proposed Intervenor’s Ability to Protect Their Interests May Be Impaired by the Court’s Disposition of this Action**

Judgment in favor of the Plaintiff would “as a practical matter impair or impede” [Proposed Intervenor’s] ability to protect [their] interest[s].” *National Parks*, 759 F.3d at 976. Just as in *National Parks*, “if [Plaintiff is] successful in receiving ... relief, [Proposed Intervenor’s] interests ... would be directly impacted by the court order.” *Id.* Plaintiff alleges that the current

“Regulation II ... permits issuers to recover far more costs than the Durbin Amendment’s plain language allows,” Dkt. 19 ¶ 82, and their Prayers for Relief each seek to set aside Regulation II under the APA, *see id.* at 37. While Plaintiff is incorrect with respect to its reading of the Amendment, an “unfavorable ruling [would] impair” Proposed Intervenor’s members’ ability to recover costs under Regulation II. *Am. Med. Ass’n v. Stenehjem*, 2019 WL 10920631, at \*5 (D.N.D. Nov. 26, 2019). Proposed Intervenor should be allowed to intervene to protect these interests from the consequences of Plaintiff’s erroneous approach.

#### **D. Existing Parties Do Not Adequately Represent Intervenor’s Interests**

Proposed Intervenor cannot rely on the Board to adequately represent their interests. Adequate representation requires only a “minimal showing that representation ‘may be’ inadequate.” *Kan. Pub. Emps. Ret. Sys. v. Reimer & Kroger Assocs. Inc.*, 60 F.3d 1304, 1308 (8th Cir. 1995). Any presumption that the government can represent a private interest should yield when the proposed intervenor has interests separate and distinct from the “public interest” represented by the government. *See National Parks*, 759 F.3d at 976-977. That is the case here.

Proposed Intervenor’s members have made significant investments in an electronic debit card payments system that benefits both consumers and merchants like Plaintiff, which means Proposed Intervenor have a direct “financial interest” in Regulation II distinct from the more general interests of the Board. *National Parks*, 759 F.3d at 977; *see also Animal Prot. Inst. v. Merriam*, 242 F.R.D. 524, 529 (D. Minn. 2006) (finding intervention as a matter of right appropriate where “[t]he State ha[d] no particular interest in preserving the rights of trappers to continue in those practices, or to ensure that the equipment, which is now lawfully employed by the Association’s members, will remain available in the future”). Specifically, Proposed Intervenor’s members have a financial interest in ensuring that the Board’s rule on permissible

interchange fees allows recovery of issuers' costs plus a reasonable rate of return for debit card transactions. The Board does not share that interest. Rather, the Board, as a governmental entity, is "ultimately tasked with the much broader responsibility of executing" the Durbin Amendment's "goal[s]," and indeed would "shirk its duty were it to advance the narrower interest of a private entity." *National Parks*, 759 F.3d at 977. And even if the Board did advance Proposed Intervenor's interests, there is no "assur[ance] that the [government]'s current position 'will remain static or unaffected by unanticipated policy shifts.'" *Id.* Proposed Intervenor's intervention is thus also necessary to ensure its interests remain protected in the event of a change in the Board's position.

Finally, although Proposed Intervenor's are aligned with the Board on the ultimate conclusion that Plaintiff's challenge should be rejected, Proposed Intervenor's anticipate important substantive differences between their and the Board's position on the statutory basis for that rejection. These differences have heightened importance following the U.S. Supreme Court's recent decision in *Loper Bright Enterprises v. Raimondo*, 144 S. Ct. 2244 (2024).

### **III. Proposed Intervenor's Also Meet The Permissive Intervention Requirements**

While Proposed Intervenor's satisfy the requirements for mandatory intervention, this Court should alternatively permit intervention under Rule 24(b). This Court may, in its discretion, grant permissive intervention when the proposed intervenor can show "(1) an independent ground for jurisdiction, (2) timeliness of the motion, and (3) that the applicant's claim or defense and the main action have a question of law or fact in common." *Flynt v. Lombardi*, 782 F.3d 963, 966 (8th Cir. 2015). "The principal consideration in ruling on a Rule 24(b) motion [for permissive intervention] is whether the proposed intervention would unduly prejudice the adjudication of the parties' rights." *South Dakota ex rel. Barnett v. U.S. Dep't of Interior*, 317 F.3d 783, 787 (8th Cir. 2003).

Each factor is easily satisfied. Proposed Intervenorors have standing to represent the interests of their members, *supra* 7-9, and the case involves a federal question, 28 U.S.C. § 1331. Further, there is no danger of prejudice because Proposed Intervenorors are prepared to submit substantive briefing in line with the schedule already entered by this Court. *Supra* 10-12. Finally, Proposed Intervenorors’ interests are directly related to Plaintiff’s challenge to Regulation II and thus clearly “in common” with the subject matter of this litigation. *Flynt*, 782 F.3d at 966.

The Court also should permit Proposed Intervenorors to intervene because they will “significantly contribute to the Court’s discernment of the underlying issues.” *Texas v. United States Dep’t of Homeland Sec.*, 2023 WL 3025080, at \*4 (S.D. Tex. April 19, 2023). Proposed Intervenorors’ members “directly participat[e]” in the debit card market regulated by Regulation II and are subject to the fee cap which Plaintiff seeks to change. *Id.* Proposed Intervenorors will therefore “provide important perspectives, substantial expertise, and experience that will aid the Court in its consideration of the issues.” *Id.* Indeed, for these very reasons, Proposed Intervenorors were permitted to participate in the previous merchant challenge to Regulation II in *NACS*.

Accordingly, should the Court decide not to grant mandatory intervention, it can and should allow permissive intervention by Proposed Intervenorors.

### CONCLUSION

Proposed Intervenorors respectfully request that the Court grant them intervention.

Dated: October 16, 2024

Respectfully submitted,

By: /s/ Noah A. Levine

**WILMER CUTLER PICKERING HALE  
AND DORR LLP**

Seth P. Waxman  
seth.waxman@wilmerhale.com  
2100 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037

Tel: (202) 663-6000  
Fax: (202) 663-6363

Noah A. Levine  
noah.levine@wilmerhale.com  
7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
Tel: (212) 230-8800  
Fax: (212) 230-8888

*Attorneys for Proposed Intervenors*



**CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2024, I filed the foregoing memorandum of law using the Court's CM/ECF system, which will send a notice of the filing to counsel for all parties.

/s/ Noah A. Levine

Noah A. Levine

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION**

CORNER POST, INC,

Plaintiff,

v.

BOARD OF GOVERNORS OF THE FED-  
ERAL RESERVE SYSTEM,

Defendant.

Case No. 1:21-cv-95-DMT-CRH

**DECLARATION OF JOHN COURT**

I, John Court, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am the Executive Vice President, General Counsel, and Chief Operating Officer of The Bank Policy Institute (“BPI”).

2. BPI is a nonpartisan public policy, research, and advocacy group that represents the policy interests of the nation’s leading banks.

3. BPI’s members, which include bank holding companies, have an interest in regulations that affect the members’ insured depository institution (“IDI”) subsidiaries.

4. Attached as Exhibit A is a true and correct copy of the list of institutions who are subject to (i.e., not exempt from) the Debit Card Interchange Standards (also known as “Regulation II”) prepared by the Board of Governors of the Federal Reserve System (the “Board”), revised as of May 16, 2024. This list is published and issued by the Board annually.

5. Each of the following institutions (1) is an IDI subsidiary of a BPI member (2) that is subject to (i.e., not exempt from) Regulation II because such subsidiary or its affiliate

issues debit cards in the United States and, individually or with its affiliates, possesses reported assets of \$10 billion or more: Ally Bank; Bank of America, National Association; BMO Bank, National Association; Capital One, National Association; Charles Schwab Bank, SSB; CIBC Bank USA; Citibank, National Association; Citizens Bank, National Association; Comerica Bank; Fifth Third Bank, National Association; First Horizon Bank; HSBC Bank USA, National Association; Huntington National Bank; JPMorgan Chase Bank, National Association; KeyBank National Association; Manufacturers & Traders Trust Company; Morgan Stanley Bank, National Association; Northern Trust Company; PNC Bank, National Association; Popular Bank; Raymond James Bank; City National Bank; Regions Bank; Santander Bank, National Association; TD Bank, National Association; Truist Bank; United Bank; U.S. Bank, National Association; Wells Fargo Bank, National Association; and Zions Bancorporation, National Association.

6. Each of BPI's members with IDI subsidiaries identified in paragraph 5 would be harmed by the Plaintiff's position in this litigation, as Plaintiff argues that the Board should be required to issue a rule substantially reducing the maximum interchange fees that institutions subject to Regulation II are permitted to charge.

7. These BPI members would be harmed in particular if the Board was prevented from including in Regulation II substantial and verifiable costs related to debit card transactions that are not specifically related to the authorization, clearance, and settlement costs for individual transactions.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: October 15, 2024

A handwritten signature in black ink, appearing to read "John Court", written above a horizontal line.

John Court

# EXHIBIT A

## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	3403	NEW YORK BRANCH	ALLIED IRISH BKS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4512	NEW YORK BRANCH	CREDIT SUISSE NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	12311	HUNTINGTON NATIONAL BANK, THE	HUNTINGTON NB	COLUMBUS	OH	National Commercial Bank	6560	7745	0
Not Exempt	17147	FIRST MERCHANTS BANK	FIRST MRCHS BK	MUNCIE	IN	State Nonmember Commercial Bank	4365	0	0
Not Exempt	23504	DIME COMMUNITY BANK	DIME CMNTY BK	BRIDGEHAMPTON	NY	State Member Commercial Bank	6976	0	0
Not Exempt	24006	PCSB BANK	PCSB BK	YORKTOWN HEIGHTS	NY	State Member Commercial Bank	15995	0	0
Not Exempt	24837	WELLS FARGO INTERNATIONAL BANKING CORPORATION	WELLS FARGO INTL BKG CORP	CHARLOTTE	NC	Investment Edge Corporation	0	0	0
Not Exempt	25085	SUNCOAST CREDIT UNION	SUNCOAST CU	TAMPA	FL	State Chartered Natural Persons Credit Union	0	0	68645
Not Exempt	30810	DISCOVER BANK	DISCOVER BK	GREENWOOD	DE	State Nonmember Commercial Bank	5649	0	0
Not Exempt	34014	NEW YORK BRANCH	STANDARD CHARTERED BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	34537	SEACOAST NATIONAL BANK	SEACOAST NB	STUART	FL	National Commercial Bank	131	14838	0
Not Exempt	35301	STATE STREET BANK AND TRUST COMPANY	STATE STREET B&TC	BOSTON	MA	State Member Commercial Bank	14	0	0
Not Exempt	41218	NEW YORK BRANCH	NATIONAL AUSTRALIA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80011	0
Not Exempt	42420	FIRST COMMONWEALTH BANK	FIRST COMMONWEALTH BK	INDIANA	PA	State Nonmember Commercial Bank	7468	0	0
Not Exempt	44769	LOS ANGELES BRANCH	WOORI BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	54973	AMERICAN SAVINGS BANK, F.S.B.	AMERICAN SVG BK FSB	HONOLULU	HI	Federal Savings Bank	32526	708384	0
Not Exempt	58971	WASHINGTON TRUST BANK	WASHINGTON TR BK	SPOKANE	WA	State Nonmember Commercial Bank	1281	0	0
Not Exempt	60143	COMERICA BANK	COMERICA BK	DALLAS	TX	State Member Commercial Bank	983	0	0
Not Exempt	63069	CITY NATIONAL BANK	CITY NB	LOS ANGELES	CA	National Commercial Bank	17281	14695	0
Not Exempt	64217	NEW YORK BRANCH	SHANGHAI CMRL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80061	0
Not Exempt	65812	NEW YORK BRANCH	SUMITOMO MITSUI BKG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	71439	CHICAGO BRANCH	MIZUHO BK CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	74711	RBC TRUST COMPANY (DELAWARE) LIMITED	RBC TC DELAWARE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	90516	0	0
Not Exempt	75633	BMO BANK NATIONAL ASSOCIATION	BMO BK NA	CHICAGO	IL	National Commercial Bank	16571	14583	0
Not Exempt	84411	VANGUARD FIDUCIARY TRUST COMPANY	VANGUARD FIDUCIARY TC	MALVERN	PA	State Nonmember Non Depository Trust Co.	91232	0	0
Not Exempt	85472	OCEANFIRST BANK, NATIONAL ASSOCIATION	OCEANFIRST BK NA	TOMS RIVER	NJ	National Commercial Bank	28359	25150	0
Not Exempt	86509	NEW YORK BRANCH	BANCO BRADESCO SA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80041	0
Not Exempt	93619	STATE STREET BANK AND TRUST COMPANY, NATIONAL ASSOCIATION	STATE STREET B&TC NA	NEW YORK	NY	National Non-Depository Trust Co.	24938	18045	0
Not Exempt	95716	NEW YORK BRANCH	STATE BK OF INDIA NY BR	NEW YORK	NY	U.S. Branch of FBO	33682	0	0
Not Exempt	96218	NEW YORK BRANCH	SHOKO CHUKIN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	99189	VYSTAR CREDIT UNION	VYSTAR CU	JACKSONVILLE	FL	State Chartered Natural Persons Credit Union	0	0	68490
Not Exempt	107244	BANK OZK	BANK OZK	LITTLE ROCK	AR	State Nonmember Commercial Bank	110	0	0
Not Exempt	110936	BANCO DO BRASIL AMERICAS	BANCO DO BRASIL AMERS	MIAMI	FL	State Nonmember Commercial Bank	26725	0	0
Not Exempt	112819	NEW YORK BRANCH	DEUTSCHE BK AG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	112837	CAPITAL ONE, NATIONAL ASSOCIATION	CAPITAL ONE NA	MC LEAN	VA	National Commercial Bank	4297	13688	0
Not Exempt	112967	LOS ANGELES BRANCH	MUFG BK LOS ANGELES BR	LOS ANGELES	CA	U.S. Branch of FBO	0	80141	0
Not Exempt	113311	NEW YORK BRANCH	DZ BK AG DEUTSCHE ZENTRA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	116068	LOS ANGELES WHOLESALE BRANCH	STATE BK OF INDIA LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	122854	INDEPENDENT BANK DBA INDEPENDENT FINANCIAL	DBA INDEPENDENT FINANCIAL	MCKINNEY	TX	State Nonmember Commercial Bank	3076	0	0
Not Exempt	125707	QUEENS BRANCH	BANK OF CHINA QUEENS BR	FLUSHING	NY	U.S. Branch of FBO	33652	80091	0
Not Exempt	128904	EASTERN BANK	EASTERN BK	BOSTON	MA	State Nonmember Commercial Bank	32773	0	0
Not Exempt	130103	NEW YORK BRANCH	ARAB BKG CORP NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80026	0
Not Exempt	132200	NEW YORK BRANCH	BANCO REPUBLICA ORIENTAL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80029	0
Not Exempt	135715	NEW YORK AGENCY	BANCO DE BOGOTA NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	135902	NEW YORK BRANCH	BANCO DO BRASIL SA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	136374	BETHPAGE FEDERAL CREDIT UNION	BETHPAGE FCU	BETHPAGE	NY	Federal Chartered Natural Persons Credit Union	0	0	4735
Not Exempt	139218	NEW YORK BRANCH	KBC BANK NV NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	140139	CHICAGO BRANCH	SOCIETE GENERALE CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	143662	UMPQUA BANK	UMPQUA BK	LAKE OSWEGO	OR	State Nonmember Commercial Bank	17266	0	0
Not Exempt	144315	NEW YORK AGENCY	P T BK NEGARA INDO PER NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	158714	NEW YORK BRANCH	ROYAL BK OF CANADA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80071	0
Not Exempt	165628	FIRST FINANCIAL BANK	FIRST FNCL BK	CINCINNATI	OH	State Member Commercial Bank	6600	0	0
Not Exempt	169877	STANDARD CHARTERED BANK INTERNATIONAL (AMERICAS) LIMITED	STANDARD CHARTERED BK INTL AME	NEW YORK	NY	Banking Edge Corporation	0	0	0
Not Exempt	174572	COLUMBIA BANK	COLUMBIA BK	FAIR LAWN	NJ	Federal Savings Bank	28834	702454	0
Not Exempt	176615	CITIGROUP INSTITUTIONAL TRUST COMPANY	CITIGROUP INSTITUTIONAL TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	91233	0	0
Not Exempt	181664	LOS ANGELES AGENCY	UNITED OVERSEAS BK LA AGY	LOS ANGELES	CA	U.S. Agency of FBO	0	0	0
Not Exempt	187255	HOUSTON AGENCY	BANK OF MONTREAL-HOUSTON AGY	HOUSTON	TX	U.S. Agency of FBO	0	0	0
Not Exempt	197478	EAST WEST BANK	EAST WEST BK	PASADENA	CA	State Member Commercial Bank	31628	0	0
Not Exempt	202907	COMMUNITY BANK, NATIONAL ASSOCIATION	COMMUNITY BK NA	CANTON	NY	National Commercial Bank	6989	8531	0
Not Exempt	204004	PROVIDENT BANK	PROVIDENT BK	JERSEY CITY	NJ	State Nonmember Savings Bank	12010	0	0
Not Exempt	208244	OLD NATIONAL BANK	OLD NB	EVANSVILLE	IN	National Commercial Bank	3832	8846	0
Not Exempt	209111	NEW YORK BRANCH	BANK OF MONTREAL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	210434	NORTHERN TRUST COMPANY, THE	NORTHERN TC	CHICAGO	IL	State Member Commercial Bank	913	0	0
Not Exempt	212513	NEW YORK BRANCH	MIZUHO BK NEW YORK BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	214807	DEUTSCHE BANK TRUST COMPANY AMERICAS	DEUTSCHE BK TC AMERICAS	NEW YORK	NY	State Member Commercial Bank	623	0	0



## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	215112	NEW YORK AGENCY	OVERSEA-CHINES BKG CORP NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	216717	NEW YORK AGENCY	UNITED OVERSEAS BK NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	216922	FIRST BANK	FIRST BK	SOUTHERN PINES	NC	State Member Commercial Bank	15019	0	0
Not Exempt	217237	CHICAGO BRANCH	STATE BANK INDIA CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	33664	0	0
Not Exempt	225698	GREENSTATE CREDIT UNION	GREENSTATE CU	NORTH LIBERTY	IA	State Chartered Natural Persons Credit Union	0	0	60269
Not Exempt	227517	NEW YORK BRANCH	UNICREDIT NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	229801	VALLEY NATIONAL BANK	VALLEY NB	PASSAIC	NJ	National Commercial Bank	9396	15790	0
Not Exempt	229913	MIZUHO BANK (USA)	MIZUHO BK USA	NEW YORK	NY	State Member Commercial Bank	21843	0	0
Not Exempt	230759	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	BROWNSVILLE	TX	State Nonmember Commercial Bank	25679	0	0
Not Exempt	233031	REGIONS BANK	REGIONS BK	BIRMINGHAM	AL	State Member Commercial Bank	12368	0	0
Not Exempt	233116	NEW YORK BRANCH	ERSTE GROUP BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80094	0
Not Exempt	245276	ORIENTAL BANK	ORIENTAL BK	SAN JUAN	PR	State Nonmember Commercial Bank	31469	0	0
Not Exempt	249612	APPLE BANK	APPLE BK	NEW YORK	NY	State Nonmember Savings Bank	16068	0	0
Not Exempt	250515	NEW YORK BRANCH	LANDESBANK HESSEN-THURIN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	253516	NEW YORK BRANCH	GULF INTL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80010	0
Not Exempt	255659	BANK OF COLORADO	BANK OF COLORADO	FORT COLLINS	CO	State Nonmember Commercial Bank	16980	0	0
Not Exempt	276579	ZIONS BANCORPORATION, NATIONAL ASSOCIATION	ZIONS BC NA	SALT LAKE CITY	UT	National Commercial Bank	2270	4341	0
Not Exempt	277697	AMERICA FIRST FEDERAL CREDIT UNION	AMERICA FIRST FCU	RIVERDALE	UT	Federal Chartered Natural Persons Credit Union	0	0	24694
Not Exempt	280110	KEYBANK NATIONAL ASSOCIATION	KEYBANK NA	CLEVELAND	OH	National Commercial Bank	17534	14761	0
Not Exempt	288853	FIRSTBANK	FIRSTBANK	LAKEWOOD	CO	State Member Commercial Bank	18714	0	0
Not Exempt	292711	NEW YORK BRANCH	MALAYAN BKG BERHAD NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	301190	SAN DIEGO COUNTY CREDIT UNION	SAN DIEGO CTY CU	SAN DIEGO	CA	State Chartered Natural Persons Credit Union	0	0	61004
Not Exempt	304913	DEUTSCHE BANK TRUST COMPANY DELAWARE	DEUTSCHE BK TC DE	NEWARK	DE	State Nonmember Commercial Bank	26392	0	0
Not Exempt	311845	ARVEST BANK	ARVEST BK	FAYETTEVILLE	AR	State Member Commercial Bank	8728	0	0
Not Exempt	317810	NEW YORK BRANCH	MITSUBISHI UFJ TR & BKG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80144	0
Not Exempt	320119	ISRAEL DISCOUNT BANK OF NEW YORK	ISRAEL DISCOUNT BK OF NY	NEW YORK	NY	State Nonmember Commercial Bank	19977	0	0
Not Exempt	322793	IDAHO CENTRAL CREDIT UNION	IDAHO CENT CU	CHUBBUCK	ID	State Chartered Natural Persons Credit Union	0	0	63194
Not Exempt	328834	CHICAGO REPRESENTATIVE OFFICE	BNP PARIBAS CHICAGO REP OFF	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	332738	CHICAGO BRANCH	CANADIAN IMPERIAL BK CHGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	339858	BOKF, NATIONAL ASSOCIATION	BOKF NA	TULSA	OK	National Commercial Bank	4214	13679	0
Not Exempt	342634	TRUSTMARK NATIONAL BANK	TRUSTMARK NB	JACKSON	MS	National Commercial Bank	4988	10523	0
Not Exempt	348104	STATE STREET INTERNATIONAL HOLDINGS	STATE STREET INTL HOLDINGS	BOSTON	MA	Investment Edge Corporation	0	0	0
Not Exempt	352772	BANNER BANK	BANNER BK	WALLA WALLA	WA	State Nonmember Commercial Bank	28489	0	0
Not Exempt	365325	UNITED BANK	UNITED BK	FAIRFAX	VA	State Member Commercial Bank	22858	0	0
Not Exempt	366573	GLOBAL FEDERAL CREDIT UNION	GLOBAL FCU	ANCHORAGE	AK	Federal Chartered Natural Persons Credit Union	0	0	5913
Not Exempt	367392	ALLIANT CREDIT UNION	ALLIANT CU	CHICAGO	IL	State Chartered Natural Persons Credit Union	0	0	67955
Not Exempt	379920	FIRST NATIONAL BANK OF PENNSYLVANIA	FIRST NB OF PA	GREENVILLE	PA	National Commercial Bank	7888	249	0
Not Exempt	382069	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	ZAPATA	TX	State Nonmember Commercial Bank	24961	0	0
Not Exempt	384018	WOORI AMERICA BANK	WOORI AMER BK	NEW YORK	NY	State Nonmember Commercial Bank	24920	0	0
Not Exempt	395238	SYNOVUS BANK	SYNOVUS BK	COLUMBUS	GA	State Member Commercial Bank	873	0	0
Not Exempt	398118	NEW YORK BRANCH	CHIBA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	398668	BANK OF NEW YORK MELLON TRUST COMPANY, NATIONAL ASSOCIATION, THE	BANK OF NY MELLON TC NA	LOS ANGELES	CA	National Commercial Bank	23472	24526	0
Not Exempt	413208	HSBC BANK USA, NATIONAL ASSOCIATION	HSBC BK USA NA	TYSONS	VA	National Commercial Bank	57890	24522	0
Not Exempt	414111	PRUDENTIAL TRUST COMPANY	PRUDENTIAL TC	SCRANTON	PA	State Nonmember Non Depository Trust Co.	91234	0	0
Not Exempt	416245	BUSEY BANK	BUSEY BK	CHAMPAIGN	IL	State Nonmember Commercial Bank	16450	0	0
Not Exempt	419134	BANCO PICHINCHA MIAMI AGENCY	BANCO PICHINCHA CA MIAMI AGY	CORAL GABLES	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	428547	ST. CHARLES BANK & TRUST COMPANY, NATIONAL ASSOCIATION	ST CHARLES B&TC NA	SAINT CHARLES	IL	National Commercial Bank	27052	25211	0
Not Exempt	431172	PACIFIC PREMIER BANK	PACIFIC PREMIER BK	IRVINE	CA	State Member Commercial Bank	32172	0	0
Not Exempt	436159	FIRSTBANK	FIRSTBANK	NASHVILLE	TN	State Nonmember Commercial Bank	8663	0	0
Not Exempt	437914	WILMINGTON SAVINGS FUND SOCIETY, FSB	WILMINGTON SVG FUND SCTY FSB	WILMINGTON	DE	Federal Savings Bank	17838	707938	0
Not Exempt	438818	NEW YORK BRANCH	BANCO BILBAO VIZCAYA ARG NY BR	NEW YORK	NY	U.S. Branch of FBO	33690	0	0
Not Exempt	444819	MUFG BANK, LTD. PRIMARY NY BRANCH	MUFG BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80138	0
Not Exempt	449038	CITICORP TRUST DELAWARE, NATIONAL ASSOCIATION	CITICORP TR DE NA	GREENVILLE	DE	National Non-Depository Trust Co.	25677	18410	0
Not Exempt	449515	NEW YORK BRANCH	METROPOLITAN B&TC NY BR	NEW YORK	NY	U.S. Branch of FBO	33656	80066	0
Not Exempt	450810	NEW YORK BRANCH	TORONTO-DOMINION BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80134	0
Not Exempt	451965	WELLS FARGO BANK, NATIONAL ASSOCIATION	WELLS FARGO BK NA	SIOUX FALLS	SD	National Commercial Bank	3511	1	0
Not Exempt	456045	CENTENNIAL BANK	CENTENNIAL BK	CONWAY	AR	State Member Commercial Bank	11241	0	0
Not Exempt	463735	HANCOCK WHITNEY BANK	HANCOCK WHITNEY BK	GULFPORT	MS	State Nonmember Commercial Bank	12441	0	0
Not Exempt	470050	FIRST FINANCIAL BANK	FIRST FNCL BK	ABILENE	TX	National Commercial Bank	3066	0	0
Not Exempt	473501	BERKSHIRE BANK	BERKSHIRE BK	PITTSFIELD	MA	State Nonmember Commercial Bank	23621	0	0
Not Exempt	474919	FULTON BANK, NATIONAL ASSOCIATION	FULTON BK NA	LANCASTER	PA	National Commercial Bank	7551	24891	0
Not Exempt	476810	CITIBANK, N.A.	CITIBANK NA	SIOUX FALLS	SD	National Commercial Bank	7213	1461	0
Not Exempt	480228	BANK OF AMERICA, NATIONAL ASSOCIATION	BANK OF AMER NA	CHARLOTTE	NC	National Commercial Bank	3510	13044	0
Not Exempt	482633	MIAMI AGENCY	BANCO DE LA NACION ARG MIA AGY	MIAMI	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	483386	DIGITAL FEDERAL CREDIT UNION	DIGITAL FCU	MARLBOROUGH	MA	Federal Chartered Natural Persons Credit Union	0	0	23521

## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	485559	FIRST HORIZON BANK	FIRST HORIZON BK	MEMPHIS	TN	State Member Commercial Bank	4977	0	0
Not Exempt	488318	BNY MELLON TRUST OF DELAWARE	BNY MELLON TR OF DE	WILMINGTON	DE	State Nonmember Commercial Bank	24867	0	0
Not Exempt	491224	FIRST-CITIZENS BANK & TRUST COMPANY	FIRST-CITIZENS B&TC	RALEIGH	NC	State Nonmember Commercial Bank	11063	0	0
Not Exempt	491381	RANDOLPH-BROOKS FEDERAL CREDIT UNION	RANDOLPH-BROOKS FCU	LIVE OAK	TX	Federal Chartered Natural Persons Credit Union	0	0	8111
Not Exempt	494261	BANC OF CALIFORNIA	BANC OF CA	LOS ANGELES	CA	State Member Commercial Bank	24045	0	0
Not Exempt	497404	TD BANK, N.A.	T D BK NA	WILMINGTON	DE	National Commercial Bank	18409	24096	0
Not Exempt	500715	NEW YORK BRANCH	BANCO SANTANDER SA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	501105	MANUFACTURERS AND TRADERS TRUST COMPANY	MANUFACTURERS & TRADERS TC	BUFFALO	NY	State Member Commercial Bank	588	0	0
Not Exempt	504713	U.S. BANK NATIONAL ASSOCIATION	U S BK NA	CINCINNATI	OH	National Commercial Bank	6548	24	0
Not Exempt	506922	SANDY SPRING BANK	SANDY SPRING BK	OLNEY	MD	State Member Commercial Bank	4865	0	0
Not Exempt	507518	NEW YORK AGENCY	WOORI BK NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	509950	FIRST UNITED BANK AND TRUST COMPANY	FIRST UNITED B&TC	DURANT	OK	State Nonmember Commercial Bank	4239	0	0
Not Exempt	510871	FIRSTBANK PUERTO RICO	FIRSTBANK PR	SAN JUAN	PR	State Nonmember Commercial Bank	30387	0	0
Not Exempt	511412	THREE WORLD FINANCIAL CENTER BRANCH	ROYAL BK CAN THRE WRLD FNCL BR	NEW YORK	NY	U.S. Branch of FBO	0	80072	0
Not Exempt	514114	NEW YORK BRANCH	CREDIT AGRICOLE CORPORAT NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	525839	CHICAGO BRANCH	BANK OF MONTREAL CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	527954	FIRST NATIONAL BANK OF OMAHA	FIRST NB OF OMAHA	OMAHA	NE	National Commercial Bank	5452	209	0
Not Exempt	538156	HOUSTON AGENCY	MUFG BK HOUSTON AGY	HOUSTON	TX	U.S. Agency of FBO	0	80143	0
Not Exempt	541101	BANK OF NEW YORK MELLON, THE	BANK OF NY MELLON	NEW YORK	NY	State Member Commercial Bank	639	0	0
Not Exempt	542733	MIAMI BRANCH	BANCO DO BRASIL SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	542939	BANCO ITAU INTERNATIONAL	BANCO ITAU INTL	MIAMI	FL	Banking Edge Corporation	0	0	0
Not Exempt	546571	PENTAGON FEDERAL CREDIT UNION	PENTAGON FCU	MCLEAN	VA	Federal Chartered Natural Persons Credit Union	0	0	227
Not Exempt	560812	NEW YORK BRANCH	AUSTRALIA & NEW ZEALAND NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80004	0
Not Exempt	561659	PINNACLE BANK - WYOMING	PINNACLE BK WY	CODY	WY	State Nonmember Commercial Bank	2232	0	0
Not Exempt	565518	NEW YORK BRANCH	BANGKOK BK PUBLIC CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80080	0
Not Exempt	568117	NEW YORK BRANCH	CANADIAN IMPERIAL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	569712	NEW YORK BRANCH	COMMONWEALTH BK OF AUS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80022	0
Not Exempt	571564	LOS ANGELES BRANCH	CMB WING LUNG BK LA BR	NEWPORT BEACH	CA	U.S. Branch of FBO	0	80087	0
Not Exempt	588478	FREEHOLD BANK	FREEHOLD BK	FREEHOLD	NJ	Federal Savings Bank	30519	718184	0
Not Exempt	592608	NEW YORK BRANCH	NATIXIS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	595270	MIDFIRST BANK	MIDFIRST BK	OKLAHOMA CITY	OK	Federal Savings Bank	4063	714191	0
Not Exempt	595430	STATE BANK OF THE LAKES, NATIONAL ASSOCIATION	STATE BK OF THE LAKES NA	ANTIOCH	IL	National Commercial Bank	5744	25200	0
Not Exempt	595869	CATHAY BANK	CATHAY BK	LOS ANGELES	CA	State Nonmember Commercial Bank	18503	0	0
Not Exempt	599401	NEW YORK BRANCH	BAYERISCHE LANDESBANK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80030	0
Not Exempt	601050	COMMERCE BANK	COMMERCE BK	KANSAS CITY	MO	State Member Commercial Bank	24998	0	0
Not Exempt	604725	PNC BANK INTERNATIONAL	PNC BK INTL	WILMINGTON	DE	Investment Edge Corporation	0	0	0
Not Exempt	606046	CADENCE BANK	CADENCE BK	TUPELO	MS	State Nonmember Commercial Bank	11813	0	0
Not Exempt	609609	HANA BANK USA, NATIONAL ASSOCIATION	HANA BK USA NA	FORT LEE	NJ	National Commercial Bank	26790	20622	0
Not Exempt	611198	MOUNTAIN AMERICA FEDERAL CREDIT UNION	MOUNTAIN AMER FCU	WEST JORDAN	UT	Federal Chartered Natural Persons Credit Union	0	0	24692
Not Exempt	613008	ROCKLAND TRUST COMPANY	ROCKLAND TC	ROCKLAND	MA	State Nonmember Commercial Bank	9712	0	0
Not Exempt	617677	NAVY FEDERAL CREDIT UNION	NAVY FCU	VIENNA	VA	Federal Chartered Natural Persons Credit Union	0	0	5536
Not Exempt	619877	USAA FEDERAL SAVINGS BANK	USAA FSB	PHOENIX	AZ	Savings & Loan Assoc	32188	707975	0
Not Exempt	625159	COMMERCE BANK	COMMERCE BK	LAREDO	TX	State Nonmember Commercial Bank	23772	0	0
Not Exempt	627715	NEW YORK AGENCY	BANK OF NOVA SCOTIA NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	628217	NEW YORK AGENCY	HANA BK NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	629812	NEW YORK BRANCH	WESTPAC BKG CORP NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80009	0
Not Exempt	631619	NEW YORK BRANCH	MEGA INTL CMRL BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	633819	NEW YORK BRANCH	COMMERZBANK AG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	634218	NEW YORK BRANCH	NATIONAL BK OF CANADA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	634638	BANCO SANTANDER INTERNATIONAL	BANCO SANTANDER INTL	MIAMI	FL	Banking Edge Corporation	0	0	0
Not Exempt	637451	PLAINSCAPITAL BANK	PLAINSCAPITAL BK	UNIVERSITY PARK	TX	State Member Commercial Bank	17491	0	0
Not Exempt	645625	WESBANCO BANK, INC.	WESBANCO BK	WHEELING	WV	State Nonmember Commercial Bank	803	0	0
Not Exempt	647021	WASHINGTON BRANCH	FIRST ABU DHABI BK USA N WA BR	WASHINGTON	DC	U.S. Branch of FBO	0	80016	0
Not Exempt	651448	JPMORGAN CHASE BANK, DEARBORN	JPMORGAN CHASE BK DEARBORN	DEARBORN	MI	State Member Commercial Bank	21761	0	0
Not Exempt	651596	LAKE MICHIGAN CREDIT UNION	LAKE MICHIGAN CU	GRAND RAPIDS	MI	State Chartered Natural Persons Credit Union	0	0	62514
Not Exempt	652874	NEXBANK	NEXBANK	DALLAS	TX	State Nonmember Commercial Bank	29209	0	0
Not Exempt	656377	WASHINGTON FEDERAL BANK	WASHINGTON FED BK	SEATTLE	WA	State Nonmember Commercial Bank	28088	0	0
Not Exempt	659855	FIRST INTERSTATE BANK	FIRST INTRST BK	BILLINGS	MT	State Member Commercial Bank	1105	0	0
Not Exempt	660637	CHICAGO BRANCH	MUFG BK CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	80140	0
Not Exempt	663245	SIMMONS BANK	SIMMONS BK	PINE BLUFF	AR	State Member Commercial Bank	3890	0	0
Not Exempt	664756	PROSPERITY BANK	PROSPERITY BK	EL CAMPO	TX	State Nonmember Commercial Bank	16835	0	0
Not Exempt	666581	SECURITY SERVICE FEDERAL CREDIT UNION	SECURITY SVC FCU	SAN ANTONIO	TX	Federal Chartered Natural Persons Credit Union	0	0	11065
Not Exempt	670560	DEUTSCHE BANK NATIONAL TRUST COMPANY	DEUTSCHE BK NAT TC	LOS ANGELES	CA	National Non-Depository Trust Co.	26732	18608	0
Not Exempt	671464	BANK OF HOPE	BANK OF HOPE	LOS ANGELES	CA	State Nonmember Commercial Bank	26610	0	0
Not Exempt	682563	FROST BANK	FROST BK	SAN ANTONIO	TX	State Member Commercial Bank	5510	0	0



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Not Exempt	683663	LOS ANGELES BRANCH	MEGA INTL CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	687009	LAKELAND BANK	LAKELAND BK	NEWFOUNDLAND	NJ	State Nonmember Commercial Bank	19953	0	0
Not Exempt	688079	WELLS FARGO TRUST COMPANY, NATIONAL ASSOCIATION	WELLS FARGO TC NA	OGDEN	UT	National Non-Depository Trust Co.	13718	2597	0
Not Exempt	693224	ATLANTIC UNION BANK	ATLANTIC UNION BK	RICHMOND	VA	State Member Commercial Bank	34589	0	0
Not Exempt	694904	FLAGSTAR BANK, NATIONAL ASSOCIATION	FLAGSTAR BK NA	HICKSVILLE	NY	National Commercial Bank	32541	25282	0
Not Exempt	702117	NBT BANK, NATIONAL ASSOCIATION	NBT BK NA	NORWICH	NY	National Commercial Bank	7230	1354	0
Not Exempt	707130	CHICAGO BRANCH	MEGA INTL CMRL BK CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	708070	GUAM BRANCH	PHILIPPINE NB GUAM BR	TAMUNING	GU	U.S. Branch of FBO	0	0	0
Not Exempt	709787	FIRST TECHNOLOGY FEDERAL CREDIT UNION	FIRST TECH FCU	SAN JOSE	CA	Federal Chartered Natural Persons Credit Union	0	0	19976
Not Exempt	719870	GUAM BRANCH	FIRST CMRL BK GUAM BR	HAGATNA	GU	U.S. Branch of FBO	0	0	0
Not Exempt	720317	BNY INTERNATIONAL FINANCING CORPORATION	BNY INTL FINANCING CORP	NEW YORK	NY	Investment Edge Corporation	0	0	0
Not Exempt	722777	SANTANDER BANK, NATIONAL ASSOCIATION	SANTANDER BK NA	WILMINGTON	DE	National Commercial Bank	29950	25022	0
Not Exempt	723112	FIFTH THIRD BANK, NATIONAL ASSOCIATION	FIFTH THIRD BK NA	CINCINNATI	OH	National Commercial Bank	6672	25190	0
Not Exempt	725732	BRADESCO BANK	BRADESCO BK	CORAL GABLES	FL	State Nonmember Commercial Bank	21265	0	0
Not Exempt	727709	NEW YORK BRANCH	BANK OF INDIA NY BR	NEW YORK	NY	U.S. Branch of FBO	33648	0	0
Not Exempt	731667	SAN FRANCISCO AGENCY	BANK OF INDIA SF AGY	SAN FRANCISCO	CA	U.S. Agency of FBO	0	0	0
Not Exempt	746568	LOS ANGELES BRANCH	PHILIPPINE NB LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	748665	SAN FRANCISCO BRANCH	SHANGHAI CMRL BK SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	749242	RENASANT BANK	RENASANT BK	TUPELO	MS	State Nonmember Commercial Bank	12437	0	0
Not Exempt	753276	HSBC INTERNATIONAL FINANCE CORPORATION (DELAWARE)	HSBC INTL FNC CORP DE	WILMINGTON	DE	Investment Edge Corporation	0	0	0
Not Exempt	761806	WEBSTER BANK, NATIONAL ASSOCIATION	WEBSTER BK NA	STAMFORD	CT	National Commercial Bank	18221	24469	0
Not Exempt	764030	AMERIS BANK	AMERIS BK	ATLANTA	GA	State Nonmember Commercial Bank	20504	0	0
Not Exempt	772446	COMERICA BANK & TRUST, NATIONAL ASSOCIATION	COMERICA B&T NA	ANN ARBOR	MI	National Commercial Bank	1596	21527	0
Not Exempt	776006	NEW YORK BRANCH	BANCO NACION ARGENTINA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	779968	STATE BANK OF INDIA (CALIFORNIA)	STATE BK OF INDIA CA	LOS ANGELES	CA	State Nonmember Commercial Bank	23998	0	0
Not Exempt	782306	BROOKLINE BANK	BROOKLINE BK	BROOKLINE	MA	State Member Commercial Bank	17798	0	0
Not Exempt	783871	BANKAMERICA INTERNATIONAL FINANCIAL CORPORATION	BANKAMERICA INTL FNCL CORP	SAN FRANCISCO	CA	Investment Edge Corporation	0	0	0
Not Exempt	788308	PLAZA BRANCH	BANK HAPOALIM BM PLAZA BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	790105	NEW YORK BRANCH	BANK HAPOALIM BM NY BR	NEW YORK	NY	U.S. Branch of FBO	33686	0	0
Not Exempt	795968	BANK OF HAWAII	BANK OF HAWAII	HONOLULU	HI	State Member Commercial Bank	18053	0	0
Not Exempt	800657	BREMER BANK, NATIONAL ASSOCIATION	BREMER BK NA	SAINT PAUL	MN	National Commercial Bank	12923	23290	0
Not Exempt	806864	LOS ANGELES BRANCH	CHINA CITIC BK INTL LA BR	ALHAMBRA	CA	U.S. Branch of FBO	0	80039	0
Not Exempt	812164	STATE STREET BANK AND TRUST COMPANY OF CALIFORNIA, NATIONAL ASSOCIATION	STATE ST B&TC OF CA NA	IRVINE	CA	National Non-Depository Trust Co.	26474	18607	0
Not Exempt	814430	CITY NATIONAL BANK OF FLORIDA	CITY NB OF FL	MIAMI	FL	National Commercial Bank	20234	15977	0
Not Exempt	817824	PNC BANK, NATIONAL ASSOCIATION	PNC BK NA	WILMINGTON	DE	National Commercial Bank	6384	1316	0
Not Exempt	840000	AMERICAS TOWER BRANCH	BANK HAPOALIM AMERICAS TWR BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	852218	JPMORGAN CHASE BANK, NATIONAL ASSOCIATION	JPMORGAN CHASE BK NA	COLUMBUS	OH	National Commercial Bank	628	8	0
Not Exempt	852320	TRUIST BANK	TRUIST BK	CHARLOTTE	NC	State Nonmember Commercial Bank	9846	0	0
Not Exempt	853952	CENTRAL TRUST BANK, THE	CENTRAL TR BK	JEFFERSON CITY	MO	State Member Commercial Bank	12633	0	0
Not Exempt	867650	PINNACLE BANK	PINNACLE BK	FORT WORTH	TX	State Nonmember Commercial Bank	20231	0	0
Not Exempt	871769	FARMERS AND MERCHANTS BANK OF LONG BEACH	FARMERS & MRCH BK	LONG BEACH	CA	State Member Commercial Bank	1225	0	0
Not Exempt	875365	SAN FRANCISCO BRANCH	SUMITOMO MITSUI BKG CORP SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	887461	LOS ANGELES BRANCH	MIZRAHI TEFAHOT BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	33661	0	0
Not Exempt	905011	NEW YORK BRANCH	NATIONAL BK OF PAKISTAN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	906915	J.P. MORGAN INTERNATIONAL FINANCE LIMITED	JP MORGAN INTL FNC	NEW YORK	NY	Investment Edge Corporation	0	0	0
Not Exempt	908508	NEW YORK BRANCH	BANK OF CHINA NY BR	NEW YORK	NY	U.S. Branch of FBO	33653	80028	0
Not Exempt	909000	NEW YORK BRANCH	BANK OF BARODA NY BR	NEW YORK	NY	U.S. Branch of FBO	33681	0	0
Not Exempt	909514	NORTHERN TRUST INTERNATIONAL BANKING CORPORATION, THE	NORTHERN TR INTL BKG CORP	JERSEY CITY	NJ	Banking Edge Corporation	0	0	0
Not Exempt	910510	NEW YORK BRANCH	NORINCHUKIN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	913856	PINNACLE BANK	PINNACLE BK	LINCOLN	NE	State Nonmember Commercial Bank	10634	0	0
Not Exempt	915878	THIRD FEDERAL SAVINGS & LOAN ASSOCIATION OF CLEVELAND	THIRD FS&LA	CLEVELAND	OH	Savings & Loan Assoc	30012	704544	0
Not Exempt	916811	NEW YORK BRANCH	RABOBANK NEDERLAND NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	917742	ASSOCIATED BANK, NATIONAL ASSOCIATION	ASSOCIATED BK NA	GREEN BAY	WI	National Commercial Bank	5296	23695	0
Not Exempt	918918	SAFRA NATIONAL BANK OF NEW YORK	SAFRA NB OF NY	NEW YORK	NY	National Commercial Bank	26876	20948	0
Not Exempt	919812	NEW YORK BRANCH	GULF INTL BK UK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80065	0
Not Exempt	922111	NEW YORK BRANCH	SOCIETE GENERALE NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	924919	NEW YORK BRANCH	SUMITOMO MITSUI TR BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	925411	SUMITOMO MITSUI TRUST BANK (U.S.A.) LIMITED	SUMITOMO MITSUI TR BK USA	HOBOKEN	NJ	State Nonmember Commercial Bank	27054	0	0
Not Exempt	929352	BELL BANK	BELL BK	FARGO	ND	State Nonmember Commercial Bank	19581	0	0
Not Exempt	930965	SMBC MANUBANK	SMBC MANUBANK	LOS ANGELES	CA	State Nonmember Commercial Bank	18618	0	0
Not Exempt	933966	CITIZENS BUSINESS BANK	CITIZENS BUS BK	ONTARIO	CA	State Nonmember Commercial Bank	21716	0	0
Not Exempt	934329	BNY MELLON, NATIONAL ASSOCIATION	BNY MELLON NA	PITTSBURGH	PA	National Commercial Bank	7946	6301	0
Not Exempt	934413	NEW YORK BRANCH	UNICREDIT BANK GMBH NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	936462	MECHANICS BANK	MECHANICS BK	WALNUT CREEK	CA	State Nonmember Commercial Bank	1768	0	0
Not Exempt	936855	UMB BANK, NATIONAL ASSOCIATION	UMB BK NA	KANSAS CITY	MO	National Commercial Bank	8273	23920	0

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Not Exempt	937898	SCHOOLSFIRST FEDERAL CREDIT UNION	SCHOOLSFIRST FCU	TUSTIN	CA	Federal Chartered Natural Persons Credit Union	0	0	24212
Not Exempt	938019	CITIBANK OVERSEAS INVESTMENT CORPORATION	CITIBANK OVERSEAS INV CORP	NEW CASTLE	DE	Investment Edge Corporation	0	0	0
Not Exempt	940311	BANCO POPULAR DE PUERTO RICO	BANCO POPULAR DE PR	SAN JUAN	PR	State Member Commercial Bank	34968	0	0
Not Exempt	958400	NEW YORK WHOLESALE BRANCH	BANK EAST ASIA NY WHOLESALE BR	NEW YORK	NY	U.S. Branch of FBO	0	80081	0
Not Exempt	959395	GOLDEN 1 CREDIT UNION, THE	GOLDEN 1 CU	SACRAMENTO	CA	State Chartered Natural Persons Credit Union	0	0	61650
Not Exempt	961624	DOLLAR BANK, FEDERAL SAVINGS BANK	DOLLAR BK FSB	PITTSBURGH	PA	Federal Savings Bank	32245	708043	0
Not Exempt	962966	SOFI BANK, NATIONAL ASSOCIATION	SOFI BK NA	COTTONWOOD HEIGHTS	UT	National Commercial Bank	26881	20862	0
Not Exempt	963945	MERCHANTS BANK OF INDIANA	MERCHANTS BK OF IN	CARMEL	IN	State Nonmember Commercial Bank	8056	0	0
Not Exempt	964616	NEW YORK BRANCH	UNITED BK FOR AFRICA PLC NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80082	0
Not Exempt	965510	UBS AG NEW YORK (1285 AVENUE OF THE AMERICAS) BRANCH	UBS AG NY 1285 AVE OF AMERS BR	NEW YORK	NY	U.S. Branch of FBO	0	80114	0
Not Exempt	968726	WASHINGTON BRANCH	NATIONAL BK OF PAKISTAN WA BR	WASHINGTON	DC	U.S. Branch of FBO	0	80003	0
Not Exempt	969714	NEW YORK BRANCH	NATIONAL BK KUWAIT SAK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80089	0
Not Exempt	972509	NEW YORK BRANCH	BNP PARIBAS NEW YORK BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	972590	BOEING EMPLOYEES CREDIT UNION	BOEING EMPL CU	TUKWILA	WA	State Chartered Natural Persons Credit Union	0	0	62604
Not Exempt	975751	CIBC NATIONAL TRUST COMPANY	CIBC NAT TC	ATLANTA	GA	National Non-Depository Trust Co.	91325	24106	0
Not Exempt	978819	MELLON OVERSEAS INVESTMENT CORPORATION	MELLON OVERSEAS INV CORP	NEW YORK	NY	Investment Edge Corporation	0	0	0
Not Exempt	980661	FIRST HAWAIIAN BANK	FIRST HAWAIIAN BK	HONOLULU	HI	State Nonmember Commercial Bank	17985	0	0
Not Exempt	986010	NEW YORK BRANCH	PHILIPPINE NB NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	992011	NEW YORK BRANCH	SVENSKA HANDELS AB PUBL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	994257	AMERIPRISE TRUST COMPANY	AMERIPRISE TC	MINNEAPOLIS	MN	State Nonmember Non Depository Trust Co.	90914	0	0
Not Exempt	996260	CTBC BANK CORP. (USA)	CTBC BK CORP USA	LOS ANGELES	CA	State Nonmember Commercial Bank	19416	0	0
Not Exempt	1001152	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	LAREDO	TX	State Nonmember Commercial Bank	19629	0	0
Not Exempt	1001705	FIDELITY MANAGEMENT TRUST COMPANY	FIDELITY MANAGEMENT TC	BOSTON	MA	State Nonmember Non Depository Trust Co.	23468	0	0
Not Exempt	1002878	NORTHWEST BANK	NORTHWEST BK	WARREN	PA	State Nonmember Savings Bank	28178	0	0
Not Exempt	1009167	SAN FRANCISCO BRANCH	STANDARD CHARTERED BK SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1010462	SAN FRANCISCO BRANCH	BNP PARIBAS SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1015560	INDUSTRIAL AND COMMERCIAL BANK OF CHINA (USA), NATIONAL ASSOCIATION	INDUSTRIAL & CMRL BK	NEW YORK	NY	National Commercial Bank	24387	24440	0
Not Exempt	1017939	UNITED COMMUNITY BANK	UNITED CMNTY BK	GREENVILLE	SC	State Nonmember Commercial Bank	16889	0	0
Not Exempt	1157424	NEW YORK BRANCH	SKANDINAVISKA ENSKILDA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1163162	LOS ANGELES BRANCH	SUMITOMO MITSUI BKG CORP LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1176881	BEAL BANK	BEAL BK	PLANO	TX	State Nonmember Commercial Bank	32574	0	0
Not Exempt	1188101	NEW YORK BRANCH	GUNMA BANK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1189117	STATE EMPLOYEES CREDIT UNION	STATE EMPL CU	RALEIGH	NC	State Chartered Natural Persons Credit Union	0	0	66310
Not Exempt	1190476	ENTERPRISE BANK & TRUST	ENTERPRISE B&TC	CLAYTON	MO	State Nonmember Commercial Bank	27237	0	0
Not Exempt	1212761	NEW YORK AGENCY	P T BK RAKYAT INDONESIA NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	1216022	SYNCHRONY BANK	SYNCHRONY BK	DRAPER	UT	Federal Savings Bank	27314	715044	0
Not Exempt	1218361	LOS ANGELES BRANCH	BANK OF CHINA LA BR	LOS ANGELES	CA	U.S. Branch of FBO	58339	80096	0
Not Exempt	1222957	NEW YORK BRANCH	DNB BK ASA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1225761	WELLS FARGO NATIONAL BANK WEST	WELLS FARGO NB WEST	LAS VEGAS	NV	National Commercial Bank	27389	21099	0
Not Exempt	1358137	NEW YORK BRANCH	MASHREQBANK PSC NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1368604	NEW YORK AGENCY	BANCO LATINOAMERICANO NY AGY	WHITE PLAINS	NY	U.S. Agency of FBO	0	0	0
Not Exempt	1386251	BANCFIRST	BANCFIRST	OKLAHOMA CITY	OK	State Member Commercial Bank	27476	0	0
Not Exempt	1391778	COMENITY BANK	COMENITY BK	WILMINGTON	DE	State Nonmember Commercial Bank	27499	0	0
Not Exempt	1394676	AMERICAN EXPRESS NATIONAL BANK	AMERICAN EXPRESS NB	SANDY	UT	National Commercial Bank	27471	25151	0
Not Exempt	1395374	SILICON VALLEY BRANCH	MEGA INTL CMRL SILICON VALL BR	SAN JOSE	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1413027	DWS TRUST COMPANY	DWS TC	NASHUA	NH	State Nonmember Non Depository Trust Co.	32714	0	0
Not Exempt	1415955	NEW YORK BRANCH	CHANG HWA CMRL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1417502	BEACON TRUST COMPANY	BEACON TC	MORRISTOWN	NJ	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	1418107	LOS ANGELES AGENCY	OVERSEA-CHINESE BKG LA AGY	LOS ANGELES	CA	U.S. Agency of FBO	0	0	0
Not Exempt	1421497	NEW YORK BRANCH	SHIZUOKA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1422980	NORTHERN TRUST INVESTMENTS, INC.	NORTHERN TR INVS	CHICAGO	IL	State Nonmember Non Depository Trust Co.	27591	0	0
Not Exempt	1437014	LOS ANGELES BRANCH	HUA NAN CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1438963	LOS ANGELES BRANCH	FIRST CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1443266	BANK OF AMERICA CALIFORNIA, NATIONAL ASSOCIATION	BANK OF AMER CA NA	SAN FRANCISCO	CA	National Commercial Bank	25178	24077	0
Not Exempt	1444021	BLACKROCK INSTITUTIONAL TRUST COMPANY, NATIONAL ASSOCIATION	BLACKROCK INSTITUTIONAL TC NA	SAN FRANCISCO	CA	National Non-Depository Trust Co.	32961	22121	0
Not Exempt	1456501	MORGAN STANLEY BANK, N.A.	MORGAN STANLEY BK NA	SALT LAKE CITY	UT	National Commercial Bank	32992	24908	0
Not Exempt	1476424	HOUSTON AGENCY	RIYAD BK HOU AGY	HOUSTON	TX	U.S. Agency of FBO	0	0	0
Not Exempt	1488771	LOS ANGELES BRANCH	CHANG HWA CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1492059	NEW YORK AGENCY	HUA NAN CMRL BK NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	1492826	NEW YORK BRANCH	BANK OF TAIWAN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1494914	SHINHAN BANK AMERICA	SHINHAN BK AMER	NEW YORK	NY	State Nonmember Commercial Bank	33188	0	0
Not Exempt	1582709	GOLDMAN SACHS LONDON HOLDINGS, INC.	GOLDMAN SACHS LONDON HOLDINGS	NEW YORK	NY	New York Subsidiary of FBO	0	0	0
Not Exempt	1594270	MERRILL LYNCH INTERNATIONAL FINANCE COMPANY	MERRILL LYNCH INTL FIN CO	NEW YORK	NY	New York Subsidiary of FBO	0	0	0
Not Exempt	1629903	ASSOCIATED TRUST COMPANY, NATIONAL ASSOCIATION	ASSOCIATED TC NA	MILWAUKEE	WI	National Non-Depository Trust Co.	27102	23250	0
Not Exempt	1751064	NEW YORK BRANCH	SHINHAN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0



## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	1751420	NEW YORK BRANCH	BANK OF EAST ASIA NY BR	NEW YORK	NY	U.S. Branch of FBO	33646	80097	0
Not Exempt	1751626	NEW YORK BRANCH	FIRST CMRL BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1820933	NEW YORK BRANCH	INDUSTRIAL BK OF KOREA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1831135	NEW YORK BRANCH	NORDDEUTSCHE LANDESBANK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1842065	CIBC BANK USA	CIBC BK USA	CHICAGO	IL	State Nonmember Commercial Bank	33306	0	0
Not Exempt	1852952	NEW YORK BRANCH	SWEDBANK AB NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1858990	LOS ANGELES BRANCH	BANK OF E ASIA LA BR	ALHAMBRA	CA	U.S. Branch of FBO	0	80104	0
Not Exempt	1861909	SEATTLE BRANCH	TAIWAN CO-OP BK SEATTLE BR	SEATTLE	WA	U.S. Branch of FBO	0	0	0
Not Exempt	1865091	STATE STREET BANK AND TRUST COMPANY OF NEW HAMPSHIRE	STATE STREET B&TC OF NH	NASHUA	NH	State Nonmember Non Depository Trust Co.	33381	0	0
Not Exempt	1867723	NEW YORK BRANCH	NORDEA ABP NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1869352	LOS ANGELES BRANCH	SHANGHAI CMRL BK LA BR	ALHAMBRA	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1883321	FIRST AMERICAN TRUST, FSB	FIRST AMER TR FSB	SANTA ANA	CA	Federal Savings Bank	26312	715660	0
Not Exempt	1893049	CHARLES SCHWAB PREMIER BANK, SSB	CHARLES SCHWAB PREMIER BK SSB	WESTLAKE	TX	State Member Savings Bank	33497	0	0
Not Exempt	1898781	NEW YORK BRANCH	BANK OF CMNTNS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80107	0
Not Exempt	1917011	DALLAS AGENCY	MUFG BK DALLAS AGY	DALLAS	TX	U.S. Agency of FBO	0	80142	0
Not Exempt	1917301	LAKE FOREST BANK & TRUST COMPANY, NATIONAL ASSOCIATION	LAKE FOREST B&TC NA	LAKE FOREST	IL	National Commercial Bank	27589	25149	0
Not Exempt	1921111	NEW YORK BRANCH	TURKIYE VAKIFLAR BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1929247	SOUTHSTATE BANK, N.A.	SOUTHSTATE BK NA	WINTER HAVEN	FL	National Commercial Bank	33555	22311	0
Not Exempt	1940747	DESJARDINS BANK, NATIONAL ASSOCIATION	DESJARDINS BK NA	HALLANDALE	FL	National Commercial Bank	33565	23852	0
Not Exempt	1942723	UBS ASSET MANAGEMENT TRUST COMPANY	UBS ASSET MGMT TC	CHICAGO	IL	State Nonmember Non Depository Trust Co.	33974	0	0
Not Exempt	1971901	BNY MELLON TRUST COMPANY OF ILLINOIS	BNY MELLON TC OF IL	CHICAGO	IL	State Nonmember Non Depository Trust Co.	33621	0	0
Not Exempt	1984312	NEW YORK BRANCH	LANDESBK BADEN WUERTEMBERG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1984602	NEW YORK BRANCH	KOOKMIN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1984796	NEW YORK BRANCH	KOREA DEVELOPMENT BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1987032	HOUSTON BRANCH	BANK OF NOVA SCOTIA HOU BR	HOUSTON	TX	U.S. Branch of FBO	0	0	0
Not Exempt	1992858	NEW YORK BRANCH	CREDIT INDUS ET CMRL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2023777	POPULAR AUTO LLC	POPULAR AUTO LLC	SAN JUAN	PR	Investment Agreement Corporation	0	0	0
Not Exempt	2024402	BANCO DE SABADELL, S.A. MIAMI BRANCH	BANCO DE SABADELL SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	2044811	WHEATON BANK & TRUST COMPANY, NATIONAL ASSOCIATION	WHEATON B&TC NA	WHEATON	IL	National Commercial Bank	33803	25203	0
Not Exempt	2045809	LOS ANGELES BRANCH	BANK OF TAIWAN LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2066121	LOS ANGELES BRANCH	TAIWAN BUS BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2107181	FDS BANK	FDS BK	MASON	OH	Savings & Loan Assoc	33831	716138	0
Not Exempt	2119773	HINSDALE BANK & TRUST COMPANY, NATIONAL ASSOCIATION	HINSDALE B&TC NA	HINSDALE	IL	National Commercial Bank	33849	25212	0
Not Exempt	2121196	TD BANK USA, NATIONAL ASSOCIATION	T D BK USA NA	WILMINGTON	DE	National Commercial Bank	33947	22611	0
Not Exempt	2163477	RAYMOND JAMES TRUST, NATIONAL ASSOCIATION	RAYMOND JAMES TR NA	SAINT PETERSBURG	FL	National Non-Depository Trust Co.	33879	24771	0
Not Exempt	2182786	GOLDMAN SACHS BANK USA	GOLDMAN SACHS BK USA	NEW YORK	NY	State Member Commercial Bank	33124	0	0
Not Exempt	2193616	RAYMOND JAMES BANK	RAYMOND JAMES BK	SAINT PETERSBURG	FL	State Member Commercial Bank	33893	0	0
Not Exempt	2233875	NATBANK, NATIONAL ASSOCIATION	NATBANK NA	HOLLYWOOD	FL	National Commercial Bank	33959	23523	0
Not Exempt	2235440	FIFTH THIRD INTERNATIONAL COMPANY	FIFTH THIRD INTL CO	CINCINNATI	OH	Investment Agreement Corporation	0	0	0
Not Exempt	2239288	WINTRUST BANK, NATIONAL ASSOCIATION	WINTRUST BK NA	CHICAGO	IL	National Commercial Bank	33935	25196	0
Not Exempt	2262718	SYNOVUS TRUST COMPANY, NATIONAL ASSOCIATION	SYNOVUS TC NA	COLUMBUS	GA	National Non-Depository Trust Co.	33962	24350	0
Not Exempt	2265456	WILMINGTON TRUST, NATIONAL ASSOCIATION	WILMINGTON TR NA	WILMINGTON	DE	National Commercial Bank	34069	22859	0
Not Exempt	2297998	EVERTRUST BANK	EVERTRUST BK	CITY OF INDUSTRY	CA	State Nonmember Commercial Bank	34010	0	0
Not Exempt	2298995	VILLAGE BANK & TRUST, NATIONAL ASSOCIATION	VILLAGE B&TC NA	ARLINGTON HEIGHTS	IL	National Commercial Bank	34011	25202	0
Not Exempt	2325882	DEUTSCHE BANK TRUST COMPANY, NATIONAL ASSOCIATION	DEUTSCHE BK TC NA	NEW YORK	NY	National Non-Depository Trust Co.	34056	24452	0
Not Exempt	2332910	FIRST COMMERCIAL BANK (U.S.A)	FIRST CMRL BK USA	ALHAMBRA	CA	State Nonmember Commercial Bank	34496	0	0
Not Exempt	2337335	UMB BANK & TRUST, NATIONAL ASSOCIATION	UMB BK & TR NA	KANSAS CITY	MO	National Non-Depository Trust Co.	34065	22874	0
Not Exempt	2339795	LIBERTYVILLE BANK & TRUST COMPANY, NATIONAL ASSOCIATION	LIBERTYVILLE B&TC NA	LIBERTYVILLE	IL	National Commercial Bank	34073	25197	0
Not Exempt	2354985	CUSTOMERS BANK	CUSTOMERS BK	MALVERN	PA	State Member Commercial Bank	34444	0	0
Not Exempt	2361077	LOS ANGELES BRANCH	TAIWAN CO-OP BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2362458	WELLS FARGO BANK SOUTH CENTRAL, NATIONAL ASSOCIATION	WELLS FARGO BK S CENT NA	HOUSTON	TX	National Commercial Bank	5146	11668	0
Not Exempt	2434113	BANK RHODE ISLAND	BANK RHODE ISLAND	PROVIDENCE	RI	State Member Commercial Bank	34147	0	0
Not Exempt	2444336	CITICORP TRUST SOUTH DAKOTA	CITICORP TR SD	SIOUX FALLS	SD	State Nonmember Non Depository Trust Co.	34159	0	0
Not Exempt	2451987	ING INVESTMENT TRUST COMPANY	ING INVESTMENT TC	HARTFORD	CT	State Nonmember Non Depository Trust Co.	34164	0	0
Not Exempt	2489805	MORGAN STANLEY PRIVATE BANK, NATIONAL ASSOCIATION	MORGAN STANLEY PRIV BK NA	PURCHASE	NY	National Commercial Bank	34221	24981	0
Not Exempt	2502656	USAA SAVINGS BANK	USAA SVG BK	LAS VEGAS	NV	State Nonmember Industrial Loan Co.	34351	0	0
Not Exempt	2508751	BARRINGTON BANK & TRUST COMPANY, NATIONAL ASSOCIATION	BARRINGTON B&TC NA	BARRINGTON	IL	National Commercial Bank	34395	23216	0
Not Exempt	2531991	WELLS FARGO DELAWARE TRUST COMPANY, NATIONAL ASSOCIATION	WELLS FARGO DE TR CO NA	WILMINGTON	DE	National Non-Depository Trust Co.	34465	23201	0
Not Exempt	2567123	U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION	U S BK TC NA	PORTLAND	OR	National Non-Depository Trust Co.	34588	23412	0
Not Exempt	2599601	KEY EQUIPMENT FINANCE INTERNATIONAL INC.	KEY EQUIP FNC INTL	SUPERIOR	CO	Investment Agreement Corporation	0	0	0
Not Exempt	2614009	LOS ANGELES BRANCH	LAND BK OF TAIWAN LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2618780	TEXAS CAPITAL BANK	TEXAS CAP BK	DALLAS	TX	State Nonmember Commercial Bank	34383	0	0
Not Exempt	2618801	UBS AG STAMFORD BRANCH	UBS AG STAMFORD BR	STAMFORD	CT	U.S. Branch of FBO	0	80135	0
Not Exempt	2623627	STATE STREET TRUST COMPANY	STATE STREET TC	CHICAGO	IL	State Nonmember Non Depository Trust Co.	34693	0	0
Not Exempt	2624400	CRYSTAL LAKE BANK & TRUST COMPANY, NATIONAL ASSOCIATION	CRYSTAL LAKE B&TC NA	CRYSTAL LAKE	IL	National Commercial Bank	34681	23574	0

## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	2631574	CHICAGO BRANCH	CREDIT AGRICOLE C&I BK CHGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	2634191	GLACIER BANK	GLACIER BK	KALISPELL	MT	State Nonmember Commercial Bank	30788	0	0
Not Exempt	2652092	EAGLEBANK	EAGLEBANK	BETHESDA	MD	State Member Commercial Bank	34742	0	0
Not Exempt	2653802	UMB TRUST COMPANY OF SOUTH DAKOTA	UMB TC OF SD	SIOUX FALLS	SD	State Nonmember Non Depository Trust Co.	35120	0	0
Not Exempt	2654911	PRINCIPAL BANK	PRINCIPAL BK	DES MOINES	IA	Federal Savings Bank	34507	714225	0
Not Exempt	2667920	U.S. BANK TRUST NATIONAL ASSOCIATION SD	U S BK TR NA SD	SIOUX FALLS	SD	National Non-Depository Trust Co.	34813	23604	0
Not Exempt	2693264	TOWN BANK, NATIONAL ASSOCIATION	TOWN BK NA	HARTLAND	WI	National Commercial Bank	34717	25201	0
Not Exempt	2696555	NEW YORK BRANCH	CTBC BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2700984	WEX BANK	WEX BK	SANDY	UT	State Nonmember Industrial Loan Co.	34697	0	0
Not Exempt	2713920	STIFEL TRUST COMPANY NATIONAL ASSOCIATION	STIFEL TC NA	SAINT LOUIS	MO	National Commercial Bank	33785	24627	0
Not Exempt	2719810	CHICAGO TRUST COMPANY, N. A., THE	CHICAGO TC NA	LAKE FOREST	IL	National Non-Depository Trust Co.	35063	23690	0
Not Exempt	2735146	EVERBANK, NATIONAL ASSOCIATION	EVERBANK NA	JACKSONVILLE	FL	National Commercial Bank	34775	25290	0
Not Exempt	2736291	POPULAR BANK	POPULAR BK	NEW YORK	NY	State Member Commercial Bank	34967	0	0
Not Exempt	2781282	BNY MELLON INVESTMENT SERVICING TRUST COMPANY	BNY MELLON INV SERVICING TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	35205	0	0
Not Exempt	2797724	TOWNEBANK	TOWNEBANK	PORTSMOUTH	VA	State Nonmember Commercial Bank	35095	0	0
Not Exempt	2809597	MIAMI BRANCH	BANCO DE CREDITO E INV MIA BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	2826062	LOS ANGELES BRANCH	BANK SINOPAC LA BR	PASADENA	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2850722	BMW BANK OF NORTH AMERICA	BMW BK OF NORTH AMER	SALT LAKE CITY	UT	State Nonmember Industrial Loan Co.	35141	0	0
Not Exempt	2851804	PNC CAPITAL LEASING, LLC	PNC CAP LEASING LLC	PITTSBURGH	PA	Investment Agreement Corporation	0	0	0
Not Exempt	2864774	TRUIST DELAWARE TRUST COMPANY	TRUIST DE TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	35483	0	0
Not Exempt	2881445	MASSMUTUAL TRUST COMPANY, FSB, THE	MASSMUTUAL TC	ENFIELD	CT	Federal Savings Bank	35394	715930	0
Not Exempt	2895424	U.S. TRUST COMPANY OF DELAWARE	U S TC OF DELAWARE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	35594	0	0
Not Exempt	2912518	NEW YORK BRANCH	INTESA SANPAOLO SPA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2914268	FIDELITY PERSONAL TRUST COMPANY, F.S.B.	FIDELITY PERSONAL TR CO FSB	BOSTON	MA	Federal Savings Bank	35206	716116	0
Not Exempt	2916963	U.S. BANK TRUST NATIONAL ASSOCIATION	US BK TR NA	WILMINGTON	DE	National Non-Depository Trust Co.	57047	24090	0
Not Exempt	2917317	AXOS BANK	AXOS BK	SAN DIEGO	CA	Savings & Loan Assoc	35546	716456	0
Not Exempt	2925666	PINNACLE BANK	PINNACLE BK	NASHVILLE	TN	State Nonmember Commercial Bank	35583	0	0
Not Exempt	2929851	LOS ANGELES BRANCH	E SUN CMRL BK LOS ANGELES BR	CITY OF INDUSTRY	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2938198	NORTHBROOK BANK & TRUST COMPANY, NATIONAL ASSOCIATION	NORTHBROOK B&TC NA	NORTHBROOK	IL	National Commercial Bank	57082	25199	0
Not Exempt	2970657	SCHAUMBURG BANK & TRUST COMPANY, NATIONAL ASSOCIATION	SCHAUMBURG B&TC NA	SCHAUMBURG	IL	National Commercial Bank	57103	24150	0
Not Exempt	2972044	NEW YORK BRANCH	NATIONAL BK EGYPT NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2980209	BARCLAYS BANK DELAWARE	BARCLAYS BK DE	WILMINGTON	DE	State Nonmember Commercial Bank	57203	0	0
Not Exempt	2986407	WESTFIELD BANK, FSB	WESTFIELD BK FSB	WESTFIELD CENTER	OH	Federal Savings Bank	57077	716697	0
Not Exempt	2992547	JOHN DEERE FINANCIAL, F.S.B.	JOHN DEERE FNCL FSB	MIDDLETON	WI	Federal Savings Bank	35237	715685	0
Not Exempt	3017081	NORTHWESTERN MUTUAL WEALTH MANAGEMENT COMPANY	NORTHWESTERN MUT WEALTH MGMT	MILWAUKEE	WI	Federal Savings Bank	57093	716662	0
Not Exempt	3045383	VANGUARD NATIONAL TRUST COMPANY, NATIONAL ASSOCIATION	VANGUARD NAT TC NA	MALVERN	PA	National Non-Depository Trust Co.	57304	24121	0
Not Exempt	3045824	CONNECTICUT BRANCH	GOVERNOR & CO BK IR STAMFOR BR	STAMFORD	CT	U.S. Branch of FBO	0	0	0
Not Exempt	3050369	USB EUROPEAN HOLDINGS COMPANY	USB EUROPEAN HOLDS CO	MINNEAPOLIS	MN	Investment Agreement Corporation	0	0	0
Not Exempt	3057470	MIAMI AGENCY	BANCO DE BOGOTA SA MIAMI AGY	MIAMI	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	3066025	GOLDMAN SACHS TRUST COMPANY, NATIONAL ASSOCIATION, THE	GOLDMAN SACHS TC NA	WILMINGTON	DE	National Non-Depository Trust Co.	57337	24173	0
Not Exempt	3076220	STIFEL BANK	STIFEL BK	SAINT LOUIS	MO	State Member Commercial Bank	57358	0	0
Not Exempt	3076248	STIFEL BANK AND TRUST	STIFEL B&T	SAINT LOUIS	MO	State Member Commercial Bank	57311	0	0
Not Exempt	3135631	BANCO DE CREDITO DEL PERU MIAMI AGENCY	BANCO DE CREDITO MIAMI AGY	CORAL GABLES	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	3138146	WESTERN ALLIANCE BANK	WESTERN ALLI BK	PHOENIX	AZ	State Member Commercial Bank	57512	0	0
Not Exempt	3150205	WORTHINGTON BANK	WORTHINGTON BK	ARLINGTON	TX	State Member Commercial Bank	57414	0	0
Not Exempt	3150447	CHARLES SCHWAB BANK, SSB	CHARLES SCHWAB BK SSB	WESTLAKE	TX	State Member Savings Bank	57450	0	0
Not Exempt	3152094	NEW YORK BRANCH	BNP PARIBAS FORTIS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3159262	NEW YORK BRANCH	CHINA CITIC BK INTL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80112	0
Not Exempt	3159329	PNC DELAWARE TRUST COMPANY	PNC DELAWARE TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3191963	HOUSTON AGENCY	BBVA MEXICO SA INS HOUSTON AGY	HOUSTON	TX	U.S. Agency of FBO	0	0	0
Not Exempt	3202702	OPTUM BANK, INC.	OPTUM BK	DRAPER	UT	State Nonmember Industrial Loan Co.	57408	0	0
Not Exempt	3212149	UBS BANK USA	UBS BK USA	SALT LAKE CITY	UT	State Nonmember Industrial Loan Co.	57565	0	0
Not Exempt	3213735	FIRST FINANCIAL TRUST & ASSET MANAGEMENT COMPANY	FIRST FNCL TR & ASSET MGMT CO	ABILENE	TX	National Non-Depository Trust Co.	57757	0	0
Not Exempt	3216017	BEVERLY BANK & TRUST COMPANY, NATIONAL ASSOCIATION	BEVERLY B&TC NA	CHICAGO	IL	National Commercial Bank	57701	24466	0
Not Exempt	3221468	VERITEX COMMUNITY BANK	VERITEX CMNTY BK	DALLAS	TX	State Member Commercial Bank	57665	0	0
Not Exempt	3224580	COMENITY CAPITAL BANK	COMENITY CAP BK	DRAPER	UT	State Nonmember Industrial Loan Co.	57570	0	0
Not Exempt	3229875	FIRST NATIONAL TRUST COMPANY	FIRST NAT TR CO	HERMITAGE	PA	National Non-Depository Trust Co.	57793	24475	0
Not Exempt	3231234	SCHWAB FAMILY TRUST COMPANY	SCHWAB FAM TR CO	HOUSTON	TX	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3277148	USB AMERICAS HOLDINGS COMPANY	USB AMERS HOLDS CO	MINNEAPOLIS	MN	Investment Agreement Corporation	0	0	0
Not Exempt	3284070	ALLY BANK	ALLY BK	SANDY	UT	State Member Commercial Bank	57803	0	0
Not Exempt	3284397	BEAL BANK USA	BEAL BK USA	LAS VEGAS	NV	State Nonmember Industrial Loan Co.	57833	0	0
Not Exempt	3284829	NORTHLAND TRUST SERVICES, INC.	NORTHLAND TR SVC	MINNEAPOLIS	MN	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3287660	TOYOTA FINANCIAL SAVINGS BANK	TOYOTA FNCL SVG BK	HENDERSON	NV	State Nonmember Industrial Loan Co.	57542	0	0
Not Exempt	3303298	CITIZENS BANK, NATIONAL ASSOCIATION	CITIZENS BK NA	PROVIDENCE	RI	National Commercial Bank	57957	24571	0
Not Exempt	3348888	SERVISFIRST BANK	SERVISFIRST BK	HOMEWOOD	AL	State Nonmember Commercial Bank	57993	0	0



## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	3353154	BMO HARRIS CENTRAL NATIONAL ASSOCIATION	BMO HARRIS CENT NA	ROSELLE	IL	National Commercial Bank	58216	24536	0
Not Exempt	3357620	HSBC TRUST COMPANY (DELAWARE), NATIONAL ASSOCIATION	HSBC TC DE NA	WILMINGTON	DE	National Commercial Bank	58188	24601	0
Not Exempt	3384952	IDAHO FIRST BANK	IDAHO FIRST BK	MCCALL	ID	State Nonmember Commercial Bank	58095	0	0
Not Exempt	3394278	SALLIE MAE BANK	SALLIE MAE BK	SALT LAKE CITY	UT	State Nonmember Industrial Loan Co.	58177	0	0
Not Exempt	3403170	NORTHERN TRUST COMPANY OF DELAWARE, THE	NORTHERN TC DELAWARE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3404207	OLD PLANK TRAIL COMMUNITY BANK, NATIONAL ASSOCIATION	OLD PLANK TRAIL CMNTY BK NA	NEW LENOX	IL	National Commercial Bank	58314	24646	0
Not Exempt	3465226	HTLF BANK	HTLF BK	DENVER	CO	State Nonmember Commercial Bank	58458	0	0
Not Exempt	3465392	PEGASUS BANK	PEGASUS BK	DALLAS	TX	State Member Commercial Bank	58483	0	0
Not Exempt	3465459	DALLAS AGENCY	ROYAL BK OF CANADA DAL AGY	DALLAS	TX	U.S. Agency of FBO	0	0	0
Not Exempt	3470239	AMERIPRISE BANK, FSB	AMERIPRISE BK FSB	MINNEAPOLIS	MN	Federal Savings Bank	58303	718164	0
Not Exempt	3475083	TRISTATE CAPITAL BANK	TRISTATE CAP BK	PITTSBURGH	PA	State Member Commercial Bank	58457	0	0
Not Exempt	3574650	GOLDMAN SACHS TRUST COMPANY OF DELAWARE, THE	GOLDMAN SACHS TR CO OF DE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3579589	STELLAR BANK	STELLAR BK	HOUSTON	TX	State Nonmember Commercial Bank	58629	0	0
Not Exempt	3637685	FIRST FOUNDATION BANK	FIRST FOUND BK	IRVINE	CA	State Nonmember Commercial Bank	58647	0	0
Not Exempt	3650808	LIVE OAK BANKING COMPANY	LIVE OAK BKG CO	WILMINGTON	NC	State Nonmember Commercial Bank	58665	0	0
Not Exempt	3712461	NEW YORK BRANCH	ICICI BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80123	0
Not Exempt	3783948	RBC BANK (GEORGIA), NATIONAL ASSOCIATION	RBC BK GA NA	ATLANTA	GA	National Commercial Bank	26342	23416	0
Not Exempt	3817393	BRYN MAWR TRUST COMPANY OF DELAWARE, THE	BRYN MAWR TC OF DE	GREENVILLE	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3823246	NEW YORK BRANCH	CHINA MERCHANTS BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3856066	HUNTINGTON BANK INTERNATIONAL, INC.	HUNTINGTON BK INTL	COLUMBUS	OH	Investment Agreement Corporation	0	0	0
Not Exempt	3903308	NEW YORK BRANCH	INDUSTRIAL & CB OF CHINA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3927591	NEW YORK BRANCH	CHINA CONSTRUCTION BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3930498	ITAU CHILE NEW YORK BRANCH	BANCO ITAU CHILE NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80126	0
Not Exempt	3938186	BANKUNITED, NATIONAL ASSOCIATION	BANKUNITED NA	MIAMI LAKES	FL	National Commercial Bank	58979	25028	0
Not Exempt	3939521	AMERICAN EXPRESS BANKING CORP.	AMERICAN EXPRESS BKG CORP	NEW YORK	NY	New York Subsidiary of FBO	0	0	0
Not Exempt	3956041	745 SEVENTH AVENUE BRANCH	BARCLAYS BK PLC SEVENTH AVE BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3958223	RABOBANK NEDERLAND SAINT LOUIS AGENCY	COOPERATIEVE CENTRALE STL AGY	CHESTERFIELD	MO	U.S. Agency of FBO	0	0	0
Not Exempt	4125778	STIFEL TRUST COMPANY DELAWARE, NATIONAL ASSOCIATION	STIFEL TC DE NA	GREENVILLE	DE	National Commercial Bank	59043	24955	0
Not Exempt	4165765	HARRIS WILLIAMS UK HOLDINGS LLC	HARRIS WILLIAMS UK HOLDS LLC	RICHMOND	VA	Investment Agreement Corporation	0	0	0
Not Exempt	4196291	CAPITAL ONE GLOBAL CORPORATION	CAPITAL ONE GLOBAL CORP	MCLEAN	VA	Investment Agreement Corporation	0	0	0
Not Exempt	4223731	NEW YORK BRANCH	LAND BK OF TAIWAN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4228099	BANCO DAVIVIENDA S.A. MIAMI BRANCH	BANCO DAVIVIENDA SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	4357225	SAN FRANCISCO BRANCH	BANK OF CMNTNS SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	80127	0
Not Exempt	4368351	KEY NATIONAL TRUST COMPANY OF DELAWARE	KEY NAT TC OF DE	WILMINGTON	DE	National Non-Depository Trust Co.	59069	25051	0
Not Exempt	4388788	CAPITAL STREET REIT HOLDINGS, LLC	CAPITAL ST REIT HOLDS LLC	WILMINGTON	DE	Investment Agreement Corporation	0	0	0
Not Exempt	4388797	CAPITAL STREET HOLDINGS, LLC	CAPITAL ST HOLDS LLC	WILMINGTON	DE	Investment Agreement Corporation	0	0	0
Not Exempt	4392806	RAYMOND JAMES CANADIAN ACQUISTION, INC.	RAYMOND JAMES CANADIAN ACQUIST	SAINT PETERSBURG	FL	Investment Agreement Corporation	0	0	0
Not Exempt	4420932	BMO DELAWARE TRUST COMPANY	BMO DE TC	GREENVILLE	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4422730	FIFC EDGE INTERNATIONAL CORP.	FIFC EDGE INTL CORP	LAKE FOREST	IL	Investment Edge Corporation	0	0	0
Not Exempt	4452296	BPAS TRUST COMPANY OF PUERTO RICO	BPAS TC OF PUERTO RICO	SAN JUAN	PR	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4455466	NEW YORK BRANCH	AGRICULTURAL BK OF CHINA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4461515	CHICAGO BRANCH	BANK OF CHINA CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	80129	0
Not Exempt	4542236	NEW YORK BRANCH	NONGHYUP BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4589857	INVESCO TRUST COMPANY	INVESCO TC	ATLANTA	GA	State Nonmember Non Depository Trust Co.	59078	0	0
Not Exempt	4597740	NORTHERN TRUST COMPANY OF CALIFORNIA	NORTHERN TC OF CA	LOS ANGELES	CA	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4724452	NORTHERN TRUST COMPANY OF NEVADA, THE	NORTHERN TC OF NV	LAS VEGAS	NV	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4725141	SAN FRANCISCO BRANCH	CMB WING LUNG BK SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	80132	0
Not Exempt	4726054	NEW YORK BRANCH	CANARA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4839860	BEACON INVESTMENT ADVISORY SERVICES, INC.	BEACON INV ADVIS SVCS	MORRISTOWN	NJ	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4865177	CHARLES SCHWAB TRUST COMPANY	CHARLES SCHWAB TC	HENDERSON	NV	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4904964	CHARLES SCHWAB TRUST COMPANY OF DELAWARE	CHARLES SCHWAB TC OF DE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4932471	NEW YORK BRANCH	TAIWAN CO-OP BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4934484	1251 BUILDING BRANCH	MIZUHO BK 1251 BLDG BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4934952	CIBC DELAWARE TRUST COMPANY	CIBC DE TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4937243	PNC OHIO TRUST COMPANY	PNC OH TC	CLEVELAND	OH	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4974145	DISCOVER CARD EXECUTION NOTE TRUST	DISC CARD EXECUTION NOTE TR	NEW CASTLE	DE	State Nonmember Commercial Bank	0	0	0
Not Exempt	4981871	MUFG BANK, LTD. SECONDARY NY BRANCH	MUFG BK SECONDARY NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80139	0
Not Exempt	5050028	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	OKLAHOMA CITY	OK	State Nonmember Commercial Bank	59093	0	0
Not Exempt	5083316	DESJARDINS FLORIDA BRANCH	FEDERATION DES CAISSES FL BR	HALLANDALE	FL	U.S. Branch of FBO	0	80121	0
Not Exempt	5087752	HUDSON BRANCH	ROYAL BK OF CANADA HUDSON BR	JERSEY CITY	NJ	U.S. Branch of FBO	0	80133	0
Not Exempt	5087949	MB FINANCIAL INTERNATIONAL, INC.	MB FNCL INTL	ROSEMONT	IL	Investment Edge Corporation	0	0	0
Not Exempt	5113866	NEW YORK BRANCH	TAIWAN BUS BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	5278251	CHARLES SCHWAB TRUST BANK	CHARLES SCHWAB TR BK	WESTLAKE	TX	State Member Savings Bank	59108	0	0
Not Exempt	5285268	NEW YORK BRANCH	LLOYDS BK CORP MKTS PLC NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	5326705	ABANCA CORPORACION MIAMI BRANCH	ABANCA CORP BANCARIA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0

Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	5453843	MIAMI BRANCH	ITAU UNIBANCO SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	5557965	FC INTERNATIONAL, INC.	FC INTL	RALEIGH	NC	Investment Edge Corporation	0	0	0
Not Exempt	5584729	HOUSTON BRANCH	FIRST CMRL BK LTD HOUSTON BR	HOUSTON	TX	U.S. Branch of FBO	0	0	0
Not Exempt	5588736	EATON VANCE TRUST COMPANY	EATON VANCE TC	BOSTON	MA	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5616273	SAN FRANCISCO BRANCH	ADYEN NV SAN FRANCISCO BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	80145	0
Not Exempt	5650398	UMB FOREIGN, LLC	UMB FOR LLC	KANSAS CITY	MO	Investment Edge Corporation	0	0	0
Not Exempt	5655704	RAYMOND JAMES TRUST COMPANY OF NEW HAMPSHIRE	RAYMOND JAMES TC OF NH	PORTSMOUTH	NH	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5686801	HOUSTON BRANCH	TAIWAN CO-OP BK HOUSTON BR	HOUSTON	TX	U.S. Branch of FBO	0	0	0
Not Exempt	5728523	GOLDSTAR TRUST COMPANY	GOLDSTAR TC	JONESBORO	AR	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5802571	UMB DELAWARE, INC.	UMB DE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5805451	WESTERN ALLIANCE TRUST COMPANY, NATIONAL ASSOCIATION	WESTERN ALLI TC NA	PHOENIX	AZ	National Non-Depository Trust Co.	57288	25281	0

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION**

CORNER POST, INC.,

Plaintiff,

v.

BOARD OF GOVERNORS OF THE FED-  
ERAL RESERVE SYSTEM,

Defendant.

Case No. 1:21-cv-95-DMT-CRH

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**DECLARATION OF STEPHANIE HELLER**

I, Stephanie Heller, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am the Executive Vice President and General Counsel of The Clearing House Association L.L.C. (“TCH”).
2. Established in 1853, TCH is the nation’s oldest banking association and represents the interests of its members by developing and promoting policies to support a safe, sound, and competitive banking system that serves customers, communities, and economic growth.
3. Attached as Exhibit A is a true and correct copy of the list of institutions who are subject to (i.e., not exempt from) the Debit Card Interchange Standards (also known as “Regulation II”) prepared by the Board of Governors of the Federal Reserve System (the “Board”), revised as of May 16, 2024. This list is published and issued by the Board annually.
4. Each of the following institutions (1) is a member of TCH and (2) is or has one or more affiliates subject to (i.e., not exempt from) Regulation II because it or its affiliate issues

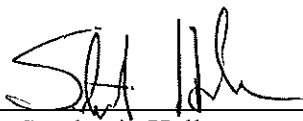
debit cards in the United States and, individually or with its affiliates, possesses reported assets of \$10 billion or more: Banco Santander, S.A.; Bank of America, National Association; BMO Bank National Association; Capital One, National Association; Citibank, National Association; Citizens Bank, National Association; Comerica Bank; Fifth Third Bank, National Association; HSBC Bank USA, National Association; The Huntington National Bank; JPMorgan Chase Bank, National Association; KeyBank, National Association; Manufacturers and Traders Trust Company; PNC Bank, National Association; Regions Bank; The Toronto-Dominion Bank; Truist Bank; U.S. Bank, National Association; Wells Fargo Bank, National Association.

5. Each of TCH's members identified in paragraph 4 would be harmed by the Plaintiff's position in this litigation, as Plaintiff argues that the Board should be required to issue a rule substantially reducing the maximum interchange fees that institutions subject to Regulation II are permitted to charge.

6. These TCH members would be harmed in particular if the Board were prevented from including in Regulation II substantial and verifiable costs related to debit card transactions that are not specifically related to the authorization, clearance, and settlement costs for individual transactions.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: October 15, 2024

  
Stephanie Heller



# EXHIBIT A

## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	3403	NEW YORK BRANCH	ALLIED IRISH BKS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4512	NEW YORK BRANCH	CREDIT SUISSE NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	12311	HUNTINGTON NATIONAL BANK, THE	HUNTINGTON NB	COLUMBUS	OH	National Commercial Bank	6560	7745	0
Not Exempt	17147	FIRST MERCHANTS BANK	FIRST MRCHS BK	MUNCIE	IN	State Nonmember Commercial Bank	4365	0	0
Not Exempt	23504	DIME COMMUNITY BANK	DIME CMNTY BK	BRIDGEHAMPTON	NY	State Member Commercial Bank	6976	0	0
Not Exempt	24006	PCSB BANK	PCSB BK	YORKTOWN HEIGHTS	NY	State Member Commercial Bank	15995	0	0
Not Exempt	24837	WELLS FARGO INTERNATIONAL BANKING CORPORATION	WELLS FARGO INTL BKG CORP	CHARLOTTE	NC	Investment Edge Corporation	0	0	0
Not Exempt	25085	SUNCOAST CREDIT UNION	SUNCOAST CU	TAMPA	FL	State Chartered Natural Persons Credit Union	0	0	68645
Not Exempt	30810	DISCOVER BANK	DISCOVER BK	GREENWOOD	DE	State Nonmember Commercial Bank	5649	0	0
Not Exempt	34014	NEW YORK BRANCH	STANDARD CHARTERED BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	34537	SEACOAST NATIONAL BANK	SEACOAST NB	STUART	FL	National Commercial Bank	131	14838	0
Not Exempt	35301	STATE STREET BANK AND TRUST COMPANY	STATE STREET B&TC	BOSTON	MA	State Member Commercial Bank	14	0	0
Not Exempt	41218	NEW YORK BRANCH	NATIONAL AUSTRALIA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80011	0
Not Exempt	42420	FIRST COMMONWEALTH BANK	FIRST COMMONWEALTH BK	INDIANA	PA	State Nonmember Commercial Bank	7468	0	0
Not Exempt	44769	LOS ANGELES BRANCH	WOORI BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	54973	AMERICAN SAVINGS BANK, F.S.B.	AMERICAN SVG BK FSB	HONOLULU	HI	Federal Savings Bank	32526	708384	0
Not Exempt	58971	WASHINGTON TRUST BANK	WASHINGTON TR BK	SPOKANE	WA	State Nonmember Commercial Bank	1281	0	0
Not Exempt	60143	COMERICA BANK	COMERICA BK	DALLAS	TX	State Member Commercial Bank	983	0	0
Not Exempt	63069	CITY NATIONAL BANK	CITY NB	LOS ANGELES	CA	National Commercial Bank	17281	14695	0
Not Exempt	64217	NEW YORK BRANCH	SHANGHAI CMRL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80061	0
Not Exempt	65812	NEW YORK BRANCH	SUMITOMO MITSUI BKG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	71439	CHICAGO BRANCH	MIZUHO BK CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	74711	RBC TRUST COMPANY (DELAWARE) LIMITED	RBC TC DELAWARE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	90516	0	0
Not Exempt	75633	BMO BANK NATIONAL ASSOCIATION	BMO BK NA	CHICAGO	IL	National Commercial Bank	16571	14583	0
Not Exempt	84411	VANGUARD FIDUCIARY TRUST COMPANY	VANGUARD FIDUCIARY TC	MALVERN	PA	State Nonmember Non Depository Trust Co.	91232	0	0
Not Exempt	85472	OCEANFIRST BANK, NATIONAL ASSOCIATION	OCEANFIRST BK NA	TOMS RIVER	NJ	National Commercial Bank	28359	25150	0
Not Exempt	86509	NEW YORK BRANCH	BANCO BRADESCO SA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80041	0
Not Exempt	93619	STATE STREET BANK AND TRUST COMPANY, NATIONAL ASSOCIATION	STATE STREET B&TC NA	NEW YORK	NY	National Non-Depository Trust Co.	24938	18045	0
Not Exempt	95716	NEW YORK BRANCH	STATE BK OF INDIA NY BR	NEW YORK	NY	U.S. Branch of FBO	33682	0	0
Not Exempt	96218	NEW YORK BRANCH	SHOKO CHUKIN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	99189	VYSTAR CREDIT UNION	VYSTAR CU	JACKSONVILLE	FL	State Chartered Natural Persons Credit Union	0	0	68490
Not Exempt	107244	BANK OZK	BANK OZK	LITTLE ROCK	AR	State Nonmember Commercial Bank	110	0	0
Not Exempt	110936	BANCO DO BRASIL AMERICAS	BANCO DO BRASIL AMERS	MIAMI	FL	State Nonmember Commercial Bank	26725	0	0
Not Exempt	112819	NEW YORK BRANCH	DEUTSCHE BK AG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	112837	CAPITAL ONE, NATIONAL ASSOCIATION	CAPITAL ONE NA	MC LEAN	VA	National Commercial Bank	4297	13688	0
Not Exempt	112967	LOS ANGELES BRANCH	MUFG BK LOS ANGELES BR	LOS ANGELES	CA	U.S. Branch of FBO	0	80141	0
Not Exempt	113311	NEW YORK BRANCH	DZ BK AG DEUTSCHE ZENTRA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	116068	LOS ANGELES WHOLESALE BRANCH	STATE BK OF INDIA LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	122854	INDEPENDENT BANK DBA INDEPENDENT FINANCIAL	DBA INDEPENDENT FINANCIAL	MCKINNEY	TX	State Nonmember Commercial Bank	3076	0	0
Not Exempt	125707	QUEENS BRANCH	BANK OF CHINA QUEENS BR	FLUSHING	NY	U.S. Branch of FBO	33652	80091	0
Not Exempt	128904	EASTERN BANK	EASTERN BK	BOSTON	MA	State Nonmember Commercial Bank	32773	0	0
Not Exempt	130103	NEW YORK BRANCH	ARAB BKG CORP NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80026	0
Not Exempt	132200	NEW YORK BRANCH	BANCO REPUBLICA ORIENTAL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80029	0
Not Exempt	135715	NEW YORK AGENCY	BANCO DE BOGOTA NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	135902	NEW YORK BRANCH	BANCO DO BRASIL SA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	136374	BETHPAGE FEDERAL CREDIT UNION	BETHPAGE FCU	BETHPAGE	NY	Federal Chartered Natural Persons Credit Union	0	0	4735
Not Exempt	139218	NEW YORK BRANCH	KBC BANK NV NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	140139	CHICAGO BRANCH	SOCIETE GENERALE CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	143662	UMPQUA BANK	UMPQUA BK	LAKE OSWEGO	OR	State Nonmember Commercial Bank	17266	0	0
Not Exempt	144315	NEW YORK AGENCY	P T BK NEGARA INDO PER NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	158714	NEW YORK BRANCH	ROYAL BK OF CANADA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80071	0
Not Exempt	165628	FIRST FINANCIAL BANK	FIRST FNCL BK	CINCINNATI	OH	State Member Commercial Bank	6600	0	0
Not Exempt	169877	STANDARD CHARTERED BANK INTERNATIONAL (AMERICAS) LIMITED	STANDARD CHARTERED BK INTL AME	NEW YORK	NY	Banking Edge Corporation	0	0	0
Not Exempt	174572	COLUMBIA BANK	COLUMBIA BK	FAIR LAWN	NJ	Federal Savings Bank	28834	702454	0
Not Exempt	176615	CITIGROUP INSTITUTIONAL TRUST COMPANY	CITIGROUP INSTITUTIONAL TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	91233	0	0
Not Exempt	181664	LOS ANGELES AGENCY	UNITED OVERSEAS BK LA AGY	LOS ANGELES	CA	U.S. Agency of FBO	0	0	0
Not Exempt	187255	HOUSTON AGENCY	BANK OF MONTREAL-HOUSTON AGY	HOUSTON	TX	U.S. Agency of FBO	0	0	0
Not Exempt	197478	EAST WEST BANK	EAST WEST BK	PASADENA	CA	State Member Commercial Bank	31628	0	0
Not Exempt	202907	COMMUNITY BANK, NATIONAL ASSOCIATION	COMMUNITY BK NA	CANTON	NY	National Commercial Bank	6989	8531	0
Not Exempt	204004	PROVIDENT BANK	PROVIDENT BK	JERSEY CITY	NJ	State Nonmember Savings Bank	12010	0	0
Not Exempt	208244	OLD NATIONAL BANK	OLD NB	EVANSVILLE	IN	National Commercial Bank	3832	8846	0
Not Exempt	209111	NEW YORK BRANCH	BANK OF MONTREAL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	210434	NORTHERN TRUST COMPANY, THE	NORTHERN TC	CHICAGO	IL	State Member Commercial Bank	913	0	0
Not Exempt	212513	NEW YORK BRANCH	MIZUHO BK NEW YORK BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	214807	DEUTSCHE BANK TRUST COMPANY AMERICAS	DEUTSCHE BK TC AMERICAS	NEW YORK	NY	State Member Commercial Bank	623	0	0

## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	215112	NEW YORK AGENCY	OVERSEA-CHINES BKG CORP NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	216717	NEW YORK AGENCY	UNITED OVERSEAS BK NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	216922	FIRST BANK	FIRST BK	SOUTHERN PINES	NC	State Member Commercial Bank	15019	0	0
Not Exempt	217237	CHICAGO BRANCH	STATE BANK INDIA CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	33664	0	0
Not Exempt	225698	GREENSTATE CREDIT UNION	GREENSTATE CU	NORTH LIBERTY	IA	State Chartered Natural Persons Credit Union	0	0	60269
Not Exempt	227517	NEW YORK BRANCH	UNICREDIT NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	229801	VALLEY NATIONAL BANK	VALLEY NB	PASSAIC	NJ	National Commercial Bank	9396	15790	0
Not Exempt	229913	MIZUHO BANK (USA)	MIZUHO BK USA	NEW YORK	NY	State Member Commercial Bank	21843	0	0
Not Exempt	230759	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	BROWNSVILLE	TX	State Nonmember Commercial Bank	25679	0	0
Not Exempt	233031	REGIONS BANK	REGIONS BK	BIRMINGHAM	AL	State Member Commercial Bank	12368	0	0
Not Exempt	233116	NEW YORK BRANCH	ERSTE GROUP BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80094	0
Not Exempt	245276	ORIENTAL BANK	ORIENTAL BK	SAN JUAN	PR	State Nonmember Commercial Bank	31469	0	0
Not Exempt	249612	APPLE BANK	APPLE BK	NEW YORK	NY	State Nonmember Savings Bank	16068	0	0
Not Exempt	250515	NEW YORK BRANCH	LANDESBANK HESSEN-THURIN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	253516	NEW YORK BRANCH	GULF INTL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80010	0
Not Exempt	255659	BANK OF COLORADO	BANK OF COLORADO	FORT COLLINS	CO	State Nonmember Commercial Bank	16980	0	0
Not Exempt	276579	ZIONS BANCORPORATION, NATIONAL ASSOCIATION	ZIONS BC NA	SALT LAKE CITY	UT	National Commercial Bank	2270	4341	0
Not Exempt	277697	AMERICA FIRST FEDERAL CREDIT UNION	AMERICA FIRST FCU	RIVERDALE	UT	Federal Chartered Natural Persons Credit Union	0	0	24694
Not Exempt	280110	KEYBANK NATIONAL ASSOCIATION	KEYBANK NA	CLEVELAND	OH	National Commercial Bank	17534	14761	0
Not Exempt	288853	FIRSTBANK	FIRSTBANK	LAKEWOOD	CO	State Member Commercial Bank	18714	0	0
Not Exempt	292711	NEW YORK BRANCH	MALAYAN BKG BERHAD NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	301190	SAN DIEGO COUNTY CREDIT UNION	SAN DIEGO CTY CU	SAN DIEGO	CA	State Chartered Natural Persons Credit Union	0	0	61004
Not Exempt	304913	DEUTSCHE BANK TRUST COMPANY DELAWARE	DEUTSCHE BK TC DE	NEWARK	DE	State Nonmember Commercial Bank	26392	0	0
Not Exempt	311845	ARVEST BANK	ARVEST BK	FAYETTEVILLE	AR	State Member Commercial Bank	8728	0	0
Not Exempt	317810	NEW YORK BRANCH	MITSUBISHI UFJ TR & BKG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80144	0
Not Exempt	320119	ISRAEL DISCOUNT BANK OF NEW YORK	ISRAEL DISCOUNT BK OF NY	NEW YORK	NY	State Nonmember Commercial Bank	19977	0	0
Not Exempt	322793	IDAHO CENTRAL CREDIT UNION	IDAHO CENT CU	CHUBBUCK	ID	State Chartered Natural Persons Credit Union	0	0	63194
Not Exempt	328834	CHICAGO REPRESENTATIVE OFFICE	BNP PARIBAS CHICAGO REP OFF	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	332738	CHICAGO BRANCH	CANADIAN IMPERIAL BK CHGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	339858	BOKF, NATIONAL ASSOCIATION	BOKF NA	TULSA	OK	National Commercial Bank	4214	13679	0
Not Exempt	342634	TRUSTMARK NATIONAL BANK	TRUSTMARK NB	JACKSON	MS	National Commercial Bank	4988	10523	0
Not Exempt	348104	STATE STREET INTERNATIONAL HOLDINGS	STATE STREET INTL HOLDINGS	BOSTON	MA	Investment Edge Corporation	0	0	0
Not Exempt	352772	BANNER BANK	BANNER BK	WALLA WALLA	WA	State Nonmember Commercial Bank	28489	0	0
Not Exempt	365325	UNITED BANK	UNITED BK	FAIRFAX	VA	State Member Commercial Bank	22858	0	0
Not Exempt	366573	GLOBAL FEDERAL CREDIT UNION	GLOBAL FCU	ANCHORAGE	AK	Federal Chartered Natural Persons Credit Union	0	0	5913
Not Exempt	367392	ALLIANT CREDIT UNION	ALLIANT CU	CHICAGO	IL	State Chartered Natural Persons Credit Union	0	0	67955
Not Exempt	379920	FIRST NATIONAL BANK OF PENNSYLVANIA	FIRST NB OF PA	GREENVILLE	PA	National Commercial Bank	7888	249	0
Not Exempt	382069	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	ZAPATA	TX	State Nonmember Commercial Bank	24961	0	0
Not Exempt	384018	WOORI AMERICA BANK	WOORI AMER BK	NEW YORK	NY	State Nonmember Commercial Bank	24920	0	0
Not Exempt	395238	SYNOVUS BANK	SYNOVUS BK	COLUMBUS	GA	State Member Commercial Bank	873	0	0
Not Exempt	398118	NEW YORK BRANCH	CHIBA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	398668	BANK OF NEW YORK MELLON TRUST COMPANY, NATIONAL ASSOCIATION, THE	BANK OF NY MELLON TC NA	LOS ANGELES	CA	National Commercial Bank	23472	24526	0
Not Exempt	413208	HSBC BANK USA, NATIONAL ASSOCIATION	HSBC BK USA NA	TYSONS	VA	National Commercial Bank	57890	24522	0
Not Exempt	414111	PRUDENTIAL TRUST COMPANY	PRUDENTIAL TC	SCRANTON	PA	State Nonmember Non Depository Trust Co.	91234	0	0
Not Exempt	416245	BUSEY BANK	BUSEY BK	CHAMPAIGN	IL	State Nonmember Commercial Bank	16450	0	0
Not Exempt	419134	BANCO PICHINCHA MIAMI AGENCY	BANCO PICHINCHA CA MIAMI AGY	CORAL GABLES	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	428547	ST. CHARLES BANK & TRUST COMPANY, NATIONAL ASSOCIATION	ST CHARLES B&TC NA	SAINT CHARLES	IL	National Commercial Bank	27052	25211	0
Not Exempt	431172	PACIFIC PREMIER BANK	PACIFIC PREMIER BK	IRVINE	CA	State Member Commercial Bank	32172	0	0
Not Exempt	436159	FIRSTBANK	FIRSTBANK	NASHVILLE	TN	State Nonmember Commercial Bank	8663	0	0
Not Exempt	437914	WILMINGTON SAVINGS FUND SOCIETY, FSB	WILMINGTON SVG FUND SCTY FSB	WILMINGTON	DE	Federal Savings Bank	17838	707938	0
Not Exempt	438818	NEW YORK BRANCH	BANCO BILBAO VIZCAYA ARG NY BR	NEW YORK	NY	U.S. Branch of FBO	33690	0	0
Not Exempt	444819	MUFG BANK, LTD. PRIMARY NY BRANCH	MUFG BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80138	0
Not Exempt	449038	CITICORP TRUST DELAWARE, NATIONAL ASSOCIATION	CITICORP TR DE NA	GREENVILLE	DE	National Non-Depository Trust Co.	25677	18410	0
Not Exempt	449515	NEW YORK BRANCH	METROPOLITAN B&TC NY BR	NEW YORK	NY	U.S. Branch of FBO	33656	80066	0
Not Exempt	450810	NEW YORK BRANCH	TORONTO-DOMINION BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80134	0
Not Exempt	451965	WELLS FARGO BANK, NATIONAL ASSOCIATION	WELLS FARGO BK NA	SIOUX FALLS	SD	National Commercial Bank	3511	1	0
Not Exempt	456045	CENTENNIAL BANK	CENTENNIAL BK	CONWAY	AR	State Member Commercial Bank	11241	0	0
Not Exempt	463735	HANCOCK WHITNEY BANK	HANCOCK WHITNEY BK	GULFPORT	MS	State Nonmember Commercial Bank	12441	0	0
Not Exempt	470050	FIRST FINANCIAL BANK	FIRST FNCL BK	ABILENE	TX	National Commercial Bank	3066	0	0
Not Exempt	473501	BERKSHIRE BANK	BERKSHIRE BK	PITTSFIELD	MA	State Nonmember Commercial Bank	23621	0	0
Not Exempt	474919	FULTON BANK, NATIONAL ASSOCIATION	FULTON BK NA	LANCASTER	PA	National Commercial Bank	7551	24891	0
Not Exempt	476810	CITIBANK, N.A.	CITIBANK NA	SIOUX FALLS	SD	National Commercial Bank	7213	1461	0
Not Exempt	480228	BANK OF AMERICA, NATIONAL ASSOCIATION	BANK OF AMER NA	CHARLOTTE	NC	National Commercial Bank	3510	13044	0
Not Exempt	482633	MIAMI AGENCY	BANCO DE LA NACION ARG MIA AGY	MIAMI	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	483386	DIGITAL FEDERAL CREDIT UNION	DIGITAL FCU	MARLBOROUGH	MA	Federal Chartered Natural Persons Credit Union	0	0	23521



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Not Exempt	485559	FIRST HORIZON BANK	FIRST HORIZON BK	MEMPHIS	TN	State Member Commercial Bank	4977	0	0
Not Exempt	488318	BNY MELLON TRUST OF DELAWARE	BNY MELLON TR OF DE	WILMINGTON	DE	State Nonmember Commercial Bank	24867	0	0
Not Exempt	491224	FIRST-CITIZENS BANK & TRUST COMPANY	FIRST-CITIZENS B&TC	RALEIGH	NC	State Nonmember Commercial Bank	11063	0	0
Not Exempt	491381	RANDOLPH-BROOKS FEDERAL CREDIT UNION	RANDOLPH-BROOKS FCU	LIVE OAK	TX	Federal Chartered Natural Persons Credit Union	0	0	8111
Not Exempt	494261	BANC OF CALIFORNIA	BANC OF CA	LOS ANGELES	CA	State Member Commercial Bank	24045	0	0
Not Exempt	497404	TD BANK, N.A.	T D BK NA	WILMINGTON	DE	National Commercial Bank	18409	24096	0
Not Exempt	500715	NEW YORK BRANCH	BANCO SANTANDER SA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	501105	MANUFACTURERS AND TRADERS TRUST COMPANY	MANUFACTURERS & TRADERS TC	BUFFALO	NY	State Member Commercial Bank	588	0	0
Not Exempt	504713	U.S. BANK NATIONAL ASSOCIATION	U S BK NA	CINCINNATI	OH	National Commercial Bank	6548	24	0
Not Exempt	506922	SANDY SPRING BANK	SANDY SPRING BK	OLNEY	MD	State Member Commercial Bank	4865	0	0
Not Exempt	507518	NEW YORK AGENCY	WOORI BK NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	509950	FIRST UNITED BANK AND TRUST COMPANY	FIRST UNITED B&TC	DURANT	OK	State Nonmember Commercial Bank	4239	0	0
Not Exempt	510871	FIRSTBANK PUERTO RICO	FIRSTBANK PR	SAN JUAN	PR	State Nonmember Commercial Bank	30387	0	0
Not Exempt	511412	THREE WORLD FINANCIAL CENTER BRANCH	ROYAL BK CAN THRE WRLD FNCL BR	NEW YORK	NY	U.S. Branch of FBO	0	80072	0
Not Exempt	514114	NEW YORK BRANCH	CREDIT AGRICOLE CORPORAT NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	525839	CHICAGO BRANCH	BANK OF MONTREAL CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	527954	FIRST NATIONAL BANK OF OMAHA	FIRST NB OF OMAHA	OMAHA	NE	National Commercial Bank	5452	209	0
Not Exempt	538156	HOUSTON AGENCY	MUFG BK HOUSTON AGY	HOUSTON	TX	U.S. Agency of FBO	0	80143	0
Not Exempt	541101	BANK OF NEW YORK MELLON, THE	BANK OF NY MELLON	NEW YORK	NY	State Member Commercial Bank	639	0	0
Not Exempt	542733	MIAMI BRANCH	BANCO DO BRASIL SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	542939	BANCO ITAU INTERNATIONAL	BANCO ITAU INTL	MIAMI	FL	Banking Edge Corporation	0	0	0
Not Exempt	546571	PENTAGON FEDERAL CREDIT UNION	PENTAGON FCU	MCLEAN	VA	Federal Chartered Natural Persons Credit Union	0	0	227
Not Exempt	560812	NEW YORK BRANCH	AUSTRALIA & NEW ZEALAND NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80004	0
Not Exempt	561659	PINNACLE BANK - WYOMING	PINNACLE BK WY	CODY	WY	State Nonmember Commercial Bank	2232	0	0
Not Exempt	565518	NEW YORK BRANCH	BANGKOK BK PUBLIC CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80080	0
Not Exempt	568117	NEW YORK BRANCH	CANADIAN IMPERIAL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	569712	NEW YORK BRANCH	COMMONWEALTH BK OF AUS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80022	0
Not Exempt	571564	LOS ANGELES BRANCH	CMB WING LUNG BK LA BR	NEWPORT BEACH	CA	U.S. Branch of FBO	0	80087	0
Not Exempt	588478	FREEHOLD BANK	FREEHOLD BK	FREEHOLD	NJ	Federal Savings Bank	30519	718184	0
Not Exempt	592608	NEW YORK BRANCH	NATIXIS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	595270	MIDFIRST BANK	MIDFIRST BK	OKLAHOMA CITY	OK	Federal Savings Bank	4063	714191	0
Not Exempt	595430	STATE BANK OF THE LAKES, NATIONAL ASSOCIATION	STATE BK OF THE LAKES NA	ANTIOCH	IL	National Commercial Bank	5744	25200	0
Not Exempt	595869	CATHAY BANK	CATHAY BK	LOS ANGELES	CA	State Nonmember Commercial Bank	18503	0	0
Not Exempt	599401	NEW YORK BRANCH	BAYERISCHE LANDESBANK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80030	0
Not Exempt	601050	COMMERCE BANK	COMMERCE BK	KANSAS CITY	MO	State Member Commercial Bank	24998	0	0
Not Exempt	604725	PNC BANK INTERNATIONAL	PNC BK INTL	WILMINGTON	DE	Investment Edge Corporation	0	0	0
Not Exempt	606046	CADENCE BANK	CADENCE BK	TUPELO	MS	State Nonmember Commercial Bank	11813	0	0
Not Exempt	609609	HANA BANK USA, NATIONAL ASSOCIATION	HANA BK USA NA	FORT LEE	NJ	National Commercial Bank	26790	20622	0
Not Exempt	611198	MOUNTAIN AMERICA FEDERAL CREDIT UNION	MOUNTAIN AMER FCU	WEST JORDAN	UT	Federal Chartered Natural Persons Credit Union	0	0	24692
Not Exempt	613008	ROCKLAND TRUST COMPANY	ROCKLAND TC	ROCKLAND	MA	State Nonmember Commercial Bank	9712	0	0
Not Exempt	617677	NAVY FEDERAL CREDIT UNION	NAVY FCU	VIENNA	VA	Federal Chartered Natural Persons Credit Union	0	0	5536
Not Exempt	619877	USAA FEDERAL SAVINGS BANK	USAA FSB	PHOENIX	AZ	Savings & Loan Assoc	32188	707975	0
Not Exempt	625159	COMMERCE BANK	COMMERCE BK	LAREDO	TX	State Nonmember Commercial Bank	23772	0	0
Not Exempt	627715	NEW YORK AGENCY	BANK OF NOVA SCOTIA NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	628217	NEW YORK AGENCY	HANA BK NY AGY	NEW YORK	NY	U.S. State like Agency of FBO	0	0	0
Not Exempt	629812	NEW YORK BRANCH	WESTPAC BKG CORP NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80009	0
Not Exempt	631619	NEW YORK BRANCH	MEGA INTL CMRL BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	633819	NEW YORK BRANCH	COMMERZBANK AG NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	634218	NEW YORK BRANCH	NATIONAL BK OF CANADA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	634638	BANCO SANTANDER INTERNATIONAL	BANCO SANTANDER INTL	MIAMI	FL	Banking Edge Corporation	0	0	0
Not Exempt	637451	PLAINSCAPITAL BANK	PLAINSCAPITAL BK	UNIVERSITY PARK	TX	State Member Commercial Bank	17491	0	0
Not Exempt	645625	WESBANCO BANK, INC.	WESBANCO BK	WHEELING	WV	State Nonmember Commercial Bank	803	0	0
Not Exempt	647021	WASHINGTON BRANCH	FIRST ABU DHABI BK USA N WA BR	WASHINGTON	DC	U.S. Branch of FBO	0	80016	0
Not Exempt	651448	JPMORGAN CHASE BANK, DEARBORN	JPMORGAN CHASE BK DEARBORN	DEARBORN	MI	State Member Commercial Bank	21761	0	0
Not Exempt	651596	LAKE MICHIGAN CREDIT UNION	LAKE MICHIGAN CU	GRAND RAPIDS	MI	State Chartered Natural Persons Credit Union	0	0	62514
Not Exempt	652874	NEXBANK	NEXBANK	DALLAS	TX	State Nonmember Commercial Bank	29209	0	0
Not Exempt	656377	WASHINGTON FEDERAL BANK	WASHINGTON FED BK	SEATTLE	WA	State Nonmember Commercial Bank	28088	0	0
Not Exempt	659855	FIRST INTERSTATE BANK	FIRST INTRST BK	BILLINGS	MT	State Member Commercial Bank	1105	0	0
Not Exempt	660637	CHICAGO BRANCH	MUFG BK CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	80140	0
Not Exempt	663245	SIMMONS BANK	SIMMONS BK	PINE BLUFF	AR	State Member Commercial Bank	3890	0	0
Not Exempt	664756	PROSPERITY BANK	PROSPERITY BK	EL CAMPO	TX	State Nonmember Commercial Bank	16835	0	0
Not Exempt	666581	SECURITY SERVICE FEDERAL CREDIT UNION	SECURITY SVC FCU	SAN ANTONIO	TX	Federal Chartered Natural Persons Credit Union	0	0	11065
Not Exempt	670560	DEUTSCHE BANK NATIONAL TRUST COMPANY	DEUTSCHE BK NAT TC	LOS ANGELES	CA	National Non-Depository Trust Co.	26732	18608	0
Not Exempt	671464	BANK OF HOPE	BANK OF HOPE	LOS ANGELES	CA	State Nonmember Commercial Bank	26610	0	0
Not Exempt	682563	FROST BANK	FROST BK	SAN ANTONIO	TX	State Member Commercial Bank	5510	0	0

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Not Exempt	683663	LOS ANGELES BRANCH	MEGA INTL CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	687009	LAKELAND BANK	LAKELAND BK	NEWFOUNDLAND	NJ	State Nonmember Commercial Bank	19953	0	0
Not Exempt	688079	WELLS FARGO TRUST COMPANY, NATIONAL ASSOCIATION	WELLS FARGO TC NA	OGDEN	UT	National Non-Depository Trust Co.	13718	2597	0
Not Exempt	693224	ATLANTIC UNION BANK	ATLANTIC UNION BK	RICHMOND	VA	State Member Commercial Bank	34589	0	0
Not Exempt	694904	FLAGSTAR BANK, NATIONAL ASSOCIATION	FLAGSTAR BK NA	HICKSVILLE	NY	National Commercial Bank	32541	25282	0
Not Exempt	702117	NBT BANK, NATIONAL ASSOCIATION	NBT BK NA	NORWICH	NY	National Commercial Bank	7230	1354	0
Not Exempt	707130	CHICAGO BRANCH	MEGA INTL CMRL BK CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	708070	GUAM BRANCH	PHILIPPINE NB GUAM BR	TAMUNING	GU	U.S. Branch of FBO	0	0	0
Not Exempt	709787	FIRST TECHNOLOGY FEDERAL CREDIT UNION	FIRST TECH FCU	SAN JOSE	CA	Federal Chartered Natural Persons Credit Union	0	0	19976
Not Exempt	719870	GUAM BRANCH	FIRST CMRL BK GUAM BR	HAGATNA	GU	U.S. Branch of FBO	0	0	0
Not Exempt	720317	BNY INTERNATIONAL FINANCING CORPORATION	BNY INTL FINANCING CORP	NEW YORK	NY	Investment Edge Corporation	0	0	0
Not Exempt	722777	SANTANDER BANK, NATIONAL ASSOCIATION	SANTANDER BK NA	WILMINGTON	DE	National Commercial Bank	29950	25022	0
Not Exempt	723112	FIFTH THIRD BANK, NATIONAL ASSOCIATION	FIFTH THIRD BK NA	CINCINNATI	OH	National Commercial Bank	6672	25190	0
Not Exempt	725732	BRADESCO BANK	BRADESCO BK	CORAL GABLES	FL	State Nonmember Commercial Bank	21265	0	0
Not Exempt	727709	NEW YORK BRANCH	BANK OF INDIA NY BR	NEW YORK	NY	U.S. Branch of FBO	33648	0	0
Not Exempt	731667	SAN FRANCISCO AGENCY	BANK OF INDIA SF AGY	SAN FRANCISCO	CA	U.S. Agency of FBO	0	0	0
Not Exempt	746568	LOS ANGELES BRANCH	PHILIPPINE NB LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	748665	SAN FRANCISCO BRANCH	SHANGHAI CMRL BK SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	749242	RENASANT BANK	RENASANT BK	TUPELO	MS	State Nonmember Commercial Bank	12437	0	0
Not Exempt	753276	HSBC INTERNATIONAL FINANCE CORPORATION (DELAWARE)	HSBC INTL FNC CORP DE	WILMINGTON	DE	Investment Edge Corporation	0	0	0
Not Exempt	761806	WEBSTER BANK, NATIONAL ASSOCIATION	WEBSTER BK NA	STAMFORD	CT	National Commercial Bank	18221	24469	0
Not Exempt	764030	AMERIS BANK	AMERIS BK	ATLANTA	GA	State Nonmember Commercial Bank	20504	0	0
Not Exempt	772446	COMERICA BANK & TRUST, NATIONAL ASSOCIATION	COMERICA B&T NA	ANN ARBOR	MI	National Commercial Bank	1596	21527	0
Not Exempt	776006	NEW YORK BRANCH	BANCO NACION ARGENTINA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	779968	STATE BANK OF INDIA (CALIFORNIA)	STATE BK OF INDIA CA	LOS ANGELES	CA	State Nonmember Commercial Bank	23998	0	0
Not Exempt	782306	BROOKLINE BANK	BROOKLINE BK	BROOKLINE	MA	State Member Commercial Bank	17798	0	0
Not Exempt	783871	BANKAMERICA INTERNATIONAL FINANCIAL CORPORATION	BANKAMERICA INTL FNCL CORP	SAN FRANCISCO	CA	Investment Edge Corporation	0	0	0
Not Exempt	788308	PLAZA BRANCH	BANK HAPOALIM BM PLAZA BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	790105	NEW YORK BRANCH	BANK HAPOALIM BM NY BR	NEW YORK	NY	U.S. Branch of FBO	33686	0	0
Not Exempt	795968	BANK OF HAWAII	BANK OF HAWAII	HONOLULU	HI	State Member Commercial Bank	18053	0	0
Not Exempt	800657	BREMER BANK, NATIONAL ASSOCIATION	BREMER BK NA	SAINT PAUL	MN	National Commercial Bank	12923	23290	0
Not Exempt	806864	LOS ANGELES BRANCH	CHINA CITIC BK INTL LA BR	ALHAMBRA	CA	U.S. Branch of FBO	0	80039	0
Not Exempt	812164	STATE STREET BANK AND TRUST COMPANY OF CALIFORNIA, NATIONAL ASSOCIATION	STATE ST B&TC OF CA NA	IRVINE	CA	National Non-Depository Trust Co.	26474	18607	0
Not Exempt	814430	CITY NATIONAL BANK OF FLORIDA	CITY NB OF FL	MIAMI	FL	National Commercial Bank	20234	15977	0
Not Exempt	817824	PNC BANK, NATIONAL ASSOCIATION	PNC BK NA	WILMINGTON	DE	National Commercial Bank	6384	1316	0
Not Exempt	840000	AMERICAS TOWER BRANCH	BANK HAPOALIM AMERICAS TWR BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	852218	JPMORGAN CHASE BANK, NATIONAL ASSOCIATION	JPMORGAN CHASE BK NA	COLUMBUS	OH	National Commercial Bank	628	8	0
Not Exempt	852320	TRUIST BANK	TRUIST BK	CHARLOTTE	NC	State Nonmember Commercial Bank	9846	0	0
Not Exempt	853952	CENTRAL TRUST BANK, THE	CENTRAL TR BK	JEFFERSON CITY	MO	State Member Commercial Bank	12633	0	0
Not Exempt	867650	PINNACLE BANK	PINNACLE BK	FORT WORTH	TX	State Nonmember Commercial Bank	20231	0	0
Not Exempt	871769	FARMERS AND MERCHANTS BANK OF LONG BEACH	FARMERS & MRCH BK	LONG BEACH	CA	State Member Commercial Bank	1225	0	0
Not Exempt	875365	SAN FRANCISCO BRANCH	SUMITOMO MITSUI BKG CORP SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	887461	LOS ANGELES BRANCH	MIZRAHI TEFAHOT BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	33661	0	0
Not Exempt	905011	NEW YORK BRANCH	NATIONAL BK OF PAKISTAN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	906915	J.P. MORGAN INTERNATIONAL FINANCE LIMITED	JP MORGAN INTL FNC	NEW YORK	NY	Investment Edge Corporation	0	0	0
Not Exempt	908508	NEW YORK BRANCH	BANK OF CHINA NY BR	NEW YORK	NY	U.S. Branch of FBO	33653	80028	0
Not Exempt	909000	NEW YORK BRANCH	BANK OF BARODA NY BR	NEW YORK	NY	U.S. Branch of FBO	33681	0	0
Not Exempt	909514	NORTHERN TRUST INTERNATIONAL BANKING CORPORATION, THE	NORTHERN TR INTL BKG CORP	JERSEY CITY	NJ	Banking Edge Corporation	0	0	0
Not Exempt	910510	NEW YORK BRANCH	NORINCHUKIN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	913856	PINNACLE BANK	PINNACLE BK	LINCOLN	NE	State Nonmember Commercial Bank	10634	0	0
Not Exempt	915878	THIRD FEDERAL SAVINGS & LOAN ASSOCIATION OF CLEVELAND	THIRD FS&LA	CLEVELAND	OH	Savings & Loan Assoc	30012	704544	0
Not Exempt	916811	NEW YORK BRANCH	RABOBANK NEDERLAND NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	917742	ASSOCIATED BANK, NATIONAL ASSOCIATION	ASSOCIATED BK NA	GREEN BAY	WI	National Commercial Bank	5296	23695	0
Not Exempt	918918	SAFRA NATIONAL BANK OF NEW YORK	SAFRA NB OF NY	NEW YORK	NY	National Commercial Bank	26876	20948	0
Not Exempt	919812	NEW YORK BRANCH	GULF INTL BK UK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80065	0
Not Exempt	922111	NEW YORK BRANCH	SOCIETE GENERALE NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	924919	NEW YORK BRANCH	SUMITOMO MITSUI TR BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	925411	SUMITOMO MITSUI TRUST BANK (U.S.A.) LIMITED	SUMITOMO MITSUI TR BK USA	HOBOKEN	NJ	State Nonmember Commercial Bank	27054	0	0
Not Exempt	929352	BELL BANK	BELL BK	FARGO	ND	State Nonmember Commercial Bank	19581	0	0
Not Exempt	930965	SMBC MANUBANK	SMBC MANUBANK	LOS ANGELES	CA	State Nonmember Commercial Bank	18618	0	0
Not Exempt	933966	CITIZENS BUSINESS BANK	CITIZENS BUS BK	ONTARIO	CA	State Nonmember Commercial Bank	21716	0	0
Not Exempt	934329	BNY MELLON, NATIONAL ASSOCIATION	BNY MELLON NA	PITTSBURGH	PA	National Commercial Bank	7946	6301	0
Not Exempt	934413	NEW YORK BRANCH	UNICREDIT BANK GMBH NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	936462	MECHANICS BANK	MECHANICS BK	WALNUT CREEK	CA	State Nonmember Commercial Bank	1768	0	0
Not Exempt	936855	UMB BANK, NATIONAL ASSOCIATION	UMB BK NA	KANSAS CITY	MO	National Commercial Bank	8273	23920	0



## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	937898	SCHOOLSFIRST FEDERAL CREDIT UNION	SCHOOLSFIRST FCU	TUSTIN	CA	Federal Chartered Natural Persons Credit Union	0	0	24212
Not Exempt	938019	CITIBANK OVERSEAS INVESTMENT CORPORATION	CITIBANK OVERSEAS INV CORP	NEW CASTLE	DE	Investment Edge Corporation	0	0	0
Not Exempt	940311	BANCO POPULAR DE PUERTO RICO	BANCO POPULAR DE PR	SAN JUAN	PR	State Member Commercial Bank	34968	0	0
Not Exempt	958400	NEW YORK WHOLESALE BRANCH	BANK EAST ASIA NY WHOLESALE BR	NEW YORK	NY	U.S. Branch of FBO	0	80081	0
Not Exempt	959395	GOLDEN 1 CREDIT UNION, THE	GOLDEN 1 CU	SACRAMENTO	CA	State Chartered Natural Persons Credit Union	0	0	61650
Not Exempt	961624	DOLLAR BANK, FEDERAL SAVINGS BANK	DOLLAR BK FSB	PITTSBURGH	PA	Federal Savings Bank	32245	708043	0
Not Exempt	962966	SOFI BANK, NATIONAL ASSOCIATION	SOFI BK NA	COTTONWOOD HEIGHTS	UT	National Commercial Bank	26881	20862	0
Not Exempt	963945	MERCHANTS BANK OF INDIANA	MERCHANTS BK OF IN	CARMEL	IN	State Nonmember Commercial Bank	8056	0	0
Not Exempt	964616	NEW YORK BRANCH	UNITED BK FOR AFRICA PLC NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80082	0
Not Exempt	965510	UBS AG NEW YORK (1285 AVENUE OF THE AMERICAS) BRANCH	UBS AG NY 1285 AVE OF AMERS BR	NEW YORK	NY	U.S. Branch of FBO	0	80114	0
Not Exempt	968726	WASHINGTON BRANCH	NATIONAL BK OF PAKISTAN WA BR	WASHINGTON	DC	U.S. Branch of FBO	0	80003	0
Not Exempt	969714	NEW YORK BRANCH	NATIONAL BK KUWAIT SAK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80089	0
Not Exempt	972509	NEW YORK BRANCH	BNP PARIBAS NEW YORK BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	972590	BOEING EMPLOYEES CREDIT UNION	BOEING EMPL CU	TUKWILA	WA	State Chartered Natural Persons Credit Union	0	0	62604
Not Exempt	975751	CIBC NATIONAL TRUST COMPANY	CIBC NAT TC	ATLANTA	GA	National Non-Depository Trust Co.	91325	24106	0
Not Exempt	978819	MELLON OVERSEAS INVESTMENT CORPORATION	MELLON OVERSEAS INV CORP	NEW YORK	NY	Investment Edge Corporation	0	0	0
Not Exempt	980661	FIRST HAWAIIAN BANK	FIRST HAWAIIAN BK	HONOLULU	HI	State Nonmember Commercial Bank	17985	0	0
Not Exempt	986010	NEW YORK BRANCH	PHILIPPINE NB NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	992011	NEW YORK BRANCH	SVENSKA HANDELS AB PUBL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	994257	AMERIPRISE TRUST COMPANY	AMERIPRISE TC	MINNEAPOLIS	MN	State Nonmember Non Depository Trust Co.	90914	0	0
Not Exempt	996260	CTBC BANK CORP. (USA)	CTBC BK CORP USA	LOS ANGELES	CA	State Nonmember Commercial Bank	19416	0	0
Not Exempt	1001152	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	LAREDO	TX	State Nonmember Commercial Bank	19629	0	0
Not Exempt	1001705	FIDELITY MANAGEMENT TRUST COMPANY	FIDELITY MANAGEMENT TC	BOSTON	MA	State Nonmember Non Depository Trust Co.	23468	0	0
Not Exempt	1002878	NORTHWEST BANK	NORTHWEST BK	WARREN	PA	State Nonmember Savings Bank	28178	0	0
Not Exempt	1009167	SAN FRANCISCO BRANCH	STANDARD CHARTERED BK SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1010462	SAN FRANCISCO BRANCH	BNP PARIBAS SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1015560	INDUSTRIAL AND COMMERCIAL BANK OF CHINA (USA), NATIONAL ASSOCIATION	INDUSTRIAL & CMRL BK	NEW YORK	NY	National Commercial Bank	24387	24440	0
Not Exempt	1017939	UNITED COMMUNITY BANK	UNITED CMNTY BK	GREENVILLE	SC	State Nonmember Commercial Bank	16889	0	0
Not Exempt	1157424	NEW YORK BRANCH	SKANDINAVISKA ENSKILDA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1163162	LOS ANGELES BRANCH	SUMITOMO MITSUI BKG CORP LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1176881	BEAL BANK	BEAL BK	PLANO	TX	State Nonmember Commercial Bank	32574	0	0
Not Exempt	1188101	NEW YORK BRANCH	GUNMA BANK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1189117	STATE EMPLOYEES CREDIT UNION	STATE EMPL CU	RALEIGH	NC	State Chartered Natural Persons Credit Union	0	0	66310
Not Exempt	1190476	ENTERPRISE BANK & TRUST	ENTERPRISE B&TC	CLAYTON	MO	State Nonmember Commercial Bank	27237	0	0
Not Exempt	1212761	NEW YORK AGENCY	P T BK RAKYAT INDONESIA NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	1216022	SYNCHRONY BANK	SYNCHRONY BK	DRAPER	UT	Federal Savings Bank	27314	715044	0
Not Exempt	1218361	LOS ANGELES BRANCH	BANK OF CHINA LA BR	LOS ANGELES	CA	U.S. Branch of FBO	58339	80096	0
Not Exempt	1222957	NEW YORK BRANCH	DNB BK ASA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1225761	WELLS FARGO NATIONAL BANK WEST	WELLS FARGO NB WEST	LAS VEGAS	NV	National Commercial Bank	27389	21099	0
Not Exempt	1358137	NEW YORK BRANCH	MASHREQBANK PSC NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1368604	NEW YORK AGENCY	BANCO LATINOAMERICANO NY AGY	WHITE PLAINS	NY	U.S. Agency of FBO	0	0	0
Not Exempt	1386251	BANCFIRST	BANCFIRST	OKLAHOMA CITY	OK	State Member Commercial Bank	27476	0	0
Not Exempt	1391778	COMENITY BANK	COMENITY BK	WILMINGTON	DE	State Nonmember Commercial Bank	27499	0	0
Not Exempt	1394676	AMERICAN EXPRESS NATIONAL BANK	AMERICAN EXPRESS NB	SANDY	UT	National Commercial Bank	27471	25151	0
Not Exempt	1395374	SILICON VALLEY BRANCH	MEGA INTL CMRL SILICON VALL BR	SAN JOSE	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1413027	DWS TRUST COMPANY	DWS TC	NASHUA	NH	State Nonmember Non Depository Trust Co.	32714	0	0
Not Exempt	1415955	NEW YORK BRANCH	CHANG HWA CMRL BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1417502	BEACON TRUST COMPANY	BEACON TC	MORRISTOWN	NJ	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	1418107	LOS ANGELES AGENCY	OVERSEA-CHINESE BKG LA AGY	LOS ANGELES	CA	U.S. Agency of FBO	0	0	0
Not Exempt	1421497	NEW YORK BRANCH	SHIZUOKA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1422980	NORTHERN TRUST INVESTMENTS, INC.	NORTHERN TR INVS	CHICAGO	IL	State Nonmember Non Depository Trust Co.	27591	0	0
Not Exempt	1437014	LOS ANGELES BRANCH	HUA NAN CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1438963	LOS ANGELES BRANCH	FIRST CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1443266	BANK OF AMERICA CALIFORNIA, NATIONAL ASSOCIATION	BANK OF AMER CA NA	SAN FRANCISCO	CA	National Commercial Bank	25178	24077	0
Not Exempt	1444021	BLACKROCK INSTITUTIONAL TRUST COMPANY, NATIONAL ASSOCIATION	BLACKROCK INSTITUTIONAL TC NA	SAN FRANCISCO	CA	National Non-Depository Trust Co.	32961	22121	0
Not Exempt	1456501	MORGAN STANLEY BANK, N.A.	MORGAN STANLEY BK NA	SALT LAKE CITY	UT	National Commercial Bank	32992	24908	0
Not Exempt	1476424	HOUSTON AGENCY	RIYAD BK HOU AGY	HOUSTON	TX	U.S. Agency of FBO	0	0	0
Not Exempt	1488771	LOS ANGELES BRANCH	CHANG HWA CMRL BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1492059	NEW YORK AGENCY	HUA NAN CMRL BK NY AGY	NEW YORK	NY	U.S. Agency of FBO	0	0	0
Not Exempt	1492826	NEW YORK BRANCH	BANK OF TAIWAN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1494914	SHINHAN BANK AMERICA	SHINHAN BK AMER	NEW YORK	NY	State Nonmember Commercial Bank	33188	0	0
Not Exempt	1582709	GOLDMAN SACHS LONDON HOLDINGS, INC.	GOLDMAN SACHS LONDON HOLDINGS	NEW YORK	NY	New York Subsidiary of FBO	0	0	0
Not Exempt	1594270	MERRILL LYNCH INTERNATIONAL FINANCE COMPANY	MERRILL LYNCH INTL FIN CO	NEW YORK	NY	New York Subsidiary of FBO	0	0	0
Not Exempt	1629903	ASSOCIATED TRUST COMPANY, NATIONAL ASSOCIATION	ASSOCIATED TC NA	MILWAUKEE	WI	National Non-Depository Trust Co.	27102	23250	0
Not Exempt	1751064	NEW YORK BRANCH	SHINHAN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0

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Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	1751420	NEW YORK BRANCH	BANK OF EAST ASIA NY BR	NEW YORK	NY	U.S. Branch of FBO	33646	80097	0
Not Exempt	1751626	NEW YORK BRANCH	FIRST CMRL BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1820933	NEW YORK BRANCH	INDUSTRIAL BK OF KOREA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1831135	NEW YORK BRANCH	NORDDEUTSCHE LANDESBANK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1842065	CIBC BANK USA	CIBC BK USA	CHICAGO	IL	State Nonmember Commercial Bank	33306	0	0
Not Exempt	1852952	NEW YORK BRANCH	SWEDBANK AB NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1858990	LOS ANGELES BRANCH	BANK OF E ASIA LA BR	ALHAMBRA	CA	U.S. Branch of FBO	0	80104	0
Not Exempt	1861909	SEATTLE BRANCH	TAIWAN CO-OP BK SEATTLE BR	SEATTLE	WA	U.S. Branch of FBO	0	0	0
Not Exempt	1865091	STATE STREET BANK AND TRUST COMPANY OF NEW HAMPSHIRE	STATE STREET B&TC OF NH	NASHUA	NH	State Nonmember Non Depository Trust Co.	33381	0	0
Not Exempt	1867723	NEW YORK BRANCH	NORDEA ABP NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1869352	LOS ANGELES BRANCH	SHANGHAI CMRL BK LA BR	ALHAMBRA	CA	U.S. Branch of FBO	0	0	0
Not Exempt	1883321	FIRST AMERICAN TRUST, FSB	FIRST AMER TR FSB	SANTA ANA	CA	Federal Savings Bank	26312	715660	0
Not Exempt	1893049	CHARLES SCHWAB PREMIER BANK, SSB	CHARLES SCHWAB PREMIER BK SSB	WESTLAKE	TX	State Member Savings Bank	33497	0	0
Not Exempt	1898781	NEW YORK BRANCH	BANK OF CMNTNS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80107	0
Not Exempt	1917011	DALLAS AGENCY	MUFG BK DALLAS AGY	DALLAS	TX	U.S. Agency of FBO	0	80142	0
Not Exempt	1917301	LAKE FOREST BANK & TRUST COMPANY, NATIONAL ASSOCIATION	LAKE FOREST B&TC NA	LAKE FOREST	IL	National Commercial Bank	27589	25149	0
Not Exempt	1921111	NEW YORK BRANCH	TURKIYE VAKIFLAR BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1929247	SOUTHSTATE BANK, N.A.	SOUTHSTATE BK NA	WINTER HAVEN	FL	National Commercial Bank	33555	22311	0
Not Exempt	1940747	DESJARDINS BANK, NATIONAL ASSOCIATION	DESJARDINS BK NA	HALLANDALE	FL	National Commercial Bank	33565	23852	0
Not Exempt	1942723	UBS ASSET MANAGEMENT TRUST COMPANY	UBS ASSET MGMT TC	CHICAGO	IL	State Nonmember Non Depository Trust Co.	33974	0	0
Not Exempt	1971901	BNY MELLON TRUST COMPANY OF ILLINOIS	BNY MELLON TC OF IL	CHICAGO	IL	State Nonmember Non Depository Trust Co.	33621	0	0
Not Exempt	1984312	NEW YORK BRANCH	LANDESBK BADEN WUERTEMB NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1984602	NEW YORK BRANCH	KOOKMIN BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1984796	NEW YORK BRANCH	KOREA DEVELOPMENT BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	1987032	HOUSTON BRANCH	BANK OF NOVA SCOTIA HOU BR	HOUSTON	TX	U.S. Branch of FBO	0	0	0
Not Exempt	1992858	NEW YORK BRANCH	CREDIT INDUS ET CMRL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2023777	POPULAR AUTO LLC	POPULAR AUTO LLC	SAN JUAN	PR	Investment Agreement Corporation	0	0	0
Not Exempt	2024402	BANCO DE SABADELL, S.A. MIAMI BRANCH	BANCO DE SABADELL SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	2044811	WHEATON BANK & TRUST COMPANY, NATIONAL ASSOCIATION	WHEATON B&TC NA	WHEATON	IL	National Commercial Bank	33803	25203	0
Not Exempt	2045809	LOS ANGELES BRANCH	BANK OF TAIWAN LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2066121	LOS ANGELES BRANCH	TAIWAN BUS BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2107181	FDS BANK	FDS BK	MASON	OH	Savings & Loan Assoc	33831	716138	0
Not Exempt	2119773	HINSDALE BANK & TRUST COMPANY, NATIONAL ASSOCIATION	HINSDALE B&TC NA	HINSDALE	IL	National Commercial Bank	33849	25212	0
Not Exempt	2121196	TD BANK USA, NATIONAL ASSOCIATION	T D BK USA NA	WILMINGTON	DE	National Commercial Bank	33947	22611	0
Not Exempt	2163477	RAYMOND JAMES TRUST, NATIONAL ASSOCIATION	RAYMOND JAMES TR NA	SAINT PETERSBURG	FL	National Non-Depository Trust Co.	33879	24771	0
Not Exempt	2182786	GOLDMAN SACHS BANK USA	GOLDMAN SACHS BK USA	NEW YORK	NY	State Member Commercial Bank	33124	0	0
Not Exempt	2193616	RAYMOND JAMES BANK	RAYMOND JAMES BK	SAINT PETERSBURG	FL	State Member Commercial Bank	33893	0	0
Not Exempt	2233875	NATBANK, NATIONAL ASSOCIATION	NATBANK NA	HOLLYWOOD	FL	National Commercial Bank	33959	23523	0
Not Exempt	2235440	FIFTH THIRD INTERNATIONAL COMPANY	FIFTH THIRD INTL CO	CINCINNATI	OH	Investment Agreement Corporation	0	0	0
Not Exempt	2239288	WINTRUST BANK, NATIONAL ASSOCIATION	WINTRUST BK NA	CHICAGO	IL	National Commercial Bank	33935	25196	0
Not Exempt	2262718	SYNOVUS TRUST COMPANY, NATIONAL ASSOCIATION	SYNOVUS TC NA	COLUMBUS	GA	National Non-Depository Trust Co.	33962	24350	0
Not Exempt	2265456	WILMINGTON TRUST, NATIONAL ASSOCIATION	WILMINGTON TR NA	WILMINGTON	DE	National Commercial Bank	34069	22859	0
Not Exempt	2297998	EVERTRUST BANK	EVERTRUST BK	CITY OF INDUSTRY	CA	State Nonmember Commercial Bank	34010	0	0
Not Exempt	2298995	VILLAGE BANK & TRUST, NATIONAL ASSOCIATION	VILLAGE B&TC NA	ARLINGTON HEIGHTS	IL	National Commercial Bank	34011	25202	0
Not Exempt	2325882	DEUTSCHE BANK TRUST COMPANY, NATIONAL ASSOCIATION	DEUTSCHE BK TC NA	NEW YORK	NY	National Non-Depository Trust Co.	34056	24452	0
Not Exempt	2332910	FIRST COMMERCIAL BANK (U.S.A)	FIRST CMRL BK USA	ALHAMBRA	CA	State Nonmember Commercial Bank	34496	0	0
Not Exempt	2337335	UMB BANK & TRUST, NATIONAL ASSOCIATION	UMB BK & TR NA	KANSAS CITY	MO	National Non-Depository Trust Co.	34065	22874	0
Not Exempt	2339795	LIBERTYVILLE BANK & TRUST COMPANY, NATIONAL ASSOCIATION	LIBERTYVILLE B&TC NA	LIBERTYVILLE	IL	National Commercial Bank	34073	25197	0
Not Exempt	2354985	CUSTOMERS BANK	CUSTOMERS BK	MALVERN	PA	State Member Commercial Bank	34444	0	0
Not Exempt	2361077	LOS ANGELES BRANCH	TAIWAN CO-OP BK LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2362458	WELLS FARGO BANK SOUTH CENTRAL, NATIONAL ASSOCIATION	WELLS FARGO BK S CENT NA	HOUSTON	TX	National Commercial Bank	5146	11668	0
Not Exempt	2434113	BANK RHODE ISLAND	BANK RHODE ISLAND	PROVIDENCE	RI	State Member Commercial Bank	34147	0	0
Not Exempt	2444336	CITICORP TRUST SOUTH DAKOTA	CITICORP TR SD	SIOUX FALLS	SD	State Nonmember Non Depository Trust Co.	34159	0	0
Not Exempt	2451987	ING INVESTMENT TRUST COMPANY	ING INVESTMENT TC	HARTFORD	CT	State Nonmember Non Depository Trust Co.	34164	0	0
Not Exempt	2489805	MORGAN STANLEY PRIVATE BANK, NATIONAL ASSOCIATION	MORGAN STANLEY PRIV BK NA	PURCHASE	NY	National Commercial Bank	34221	24981	0
Not Exempt	2502656	USAA SAVINGS BANK	USAA SVG BK	LAS VEGAS	NV	State Nonmember Industrial Loan Co.	34351	0	0
Not Exempt	2508751	BARRINGTON BANK & TRUST COMPANY, NATIONAL ASSOCIATION	BARRINGTON B&TC NA	BARRINGTON	IL	National Commercial Bank	34395	23216	0
Not Exempt	2531991	WELLS FARGO DELAWARE TRUST COMPANY, NATIONAL ASSOCIATION	WELLS FARGO DE TR CO NA	WILMINGTON	DE	National Non-Depository Trust Co.	34465	23201	0
Not Exempt	2567123	U.S. BANK TRUST COMPANY, NATIONAL ASSOCIATION	U S BK TC NA	PORTLAND	OR	National Non-Depository Trust Co.	34588	23412	0
Not Exempt	2599601	KEY EQUIPMENT FINANCE INTERNATIONAL INC.	KEY EQUIP FNC INTL	SUPERIOR	CO	Investment Agreement Corporation	0	0	0
Not Exempt	2614009	LOS ANGELES BRANCH	LAND BK OF TAIWAN LA BR	LOS ANGELES	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2618780	TEXAS CAPITAL BANK	TEXAS CAP BK	DALLAS	TX	State Nonmember Commercial Bank	34383	0	0
Not Exempt	2618801	UBS AG STAMFORD BRANCH	UBS AG STAMFORD BR	STAMFORD	CT	U.S. Branch of FBO	0	80135	0
Not Exempt	2623627	STATE STREET TRUST COMPANY	STATE STREET TC	CHICAGO	IL	State Nonmember Non Depository Trust Co.	34693	0	0
Not Exempt	2624400	CRYSTAL LAKE BANK & TRUST COMPANY, NATIONAL ASSOCIATION	CRYSTAL LAKE B&TC NA	CRYSTAL LAKE	IL	National Commercial Bank	34681	23574	0



## Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	2631574	CHICAGO BRANCH	CREDIT AGRICOLE C&I BK CHGO BR	CHICAGO	IL	U.S. Branch of FBO	0	0	0
Not Exempt	2634191	GLACIER BANK	GLACIER BK	KALISPELL	MT	State Nonmember Commercial Bank	30788	0	0
Not Exempt	2652092	EAGLEBANK	EAGLEBANK	BETHESDA	MD	State Member Commercial Bank	34742	0	0
Not Exempt	2653802	UMB TRUST COMPANY OF SOUTH DAKOTA	UMB TC OF SD	SIOUX FALLS	SD	State Nonmember Non Depository Trust Co.	35120	0	0
Not Exempt	2654911	PRINCIPAL BANK	PRINCIPAL BK	DES MOINES	IA	Federal Savings Bank	34507	714225	0
Not Exempt	2667920	U.S. BANK TRUST NATIONAL ASSOCIATION SD	U S BK TR NA SD	SIOUX FALLS	SD	National Non-Depository Trust Co.	34813	23604	0
Not Exempt	2693264	TOWN BANK, NATIONAL ASSOCIATION	TOWN BK NA	HARTLAND	WI	National Commercial Bank	34717	25201	0
Not Exempt	2696555	NEW YORK BRANCH	CTBC BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2700984	WEX BANK	WEX BK	SANDY	UT	State Nonmember Industrial Loan Co.	34697	0	0
Not Exempt	2713920	STIFEL TRUST COMPANY NATIONAL ASSOCIATION	STIFEL TC NA	SAINT LOUIS	MO	National Commercial Bank	33785	24627	0
Not Exempt	2719810	CHICAGO TRUST COMPANY, N. A., THE	CHICAGO TC NA	LAKE FOREST	IL	National Non-Depository Trust Co.	35063	23690	0
Not Exempt	2735146	EVERBANK, NATIONAL ASSOCIATION	EVERBANK NA	JACKSONVILLE	FL	National Commercial Bank	34775	25290	0
Not Exempt	2736291	POPULAR BANK	POPULAR BK	NEW YORK	NY	State Member Commercial Bank	34967	0	0
Not Exempt	2781282	BNY MELLON INVESTMENT SERVICING TRUST COMPANY	BNY MELLON INV SERVICING TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	35205	0	0
Not Exempt	2797724	TOWNEBANK	TOWNEBANK	PORTSMOUTH	VA	State Nonmember Commercial Bank	35095	0	0
Not Exempt	2809597	MIAMI BRANCH	BANCO DE CREDITO E INV MIA BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	2826062	LOS ANGELES BRANCH	BANK SINOPAC LA BR	PASADENA	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2850722	BMW BANK OF NORTH AMERICA	BMW BK OF NORTH AMER	SALT LAKE CITY	UT	State Nonmember Industrial Loan Co.	35141	0	0
Not Exempt	2851804	PNC CAPITAL LEASING, LLC	PNC CAP LEASING LLC	PITTSBURGH	PA	Investment Agreement Corporation	0	0	0
Not Exempt	2864774	TRUIST DELAWARE TRUST COMPANY	TRUIST DE TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	35483	0	0
Not Exempt	2881445	MASSMUTUAL TRUST COMPANY, FSB, THE	MASSMUTUAL TC	ENFIELD	CT	Federal Savings Bank	35394	715930	0
Not Exempt	2895424	U.S. TRUST COMPANY OF DELAWARE	U S TC OF DELAWARE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	35594	0	0
Not Exempt	2912518	NEW YORK BRANCH	INTESA SANPAOLO SPA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2914268	FIDELITY PERSONAL TRUST COMPANY, F.S.B.	FIDELITY PERSONAL TR CO FSB	BOSTON	MA	Federal Savings Bank	35206	716116	0
Not Exempt	2916963	U.S. BANK TRUST NATIONAL ASSOCIATION	US BK TR NA	WILMINGTON	DE	National Non-Depository Trust Co.	57047	24090	0
Not Exempt	2917317	AXOS BANK	AXOS BK	SAN DIEGO	CA	Savings & Loan Assoc	35546	716456	0
Not Exempt	2925666	PINNACLE BANK	PINNACLE BK	NASHVILLE	TN	State Nonmember Commercial Bank	35583	0	0
Not Exempt	2929851	LOS ANGELES BRANCH	E SUN CMRL BK LOS ANGELES BR	CITY OF INDUSTRY	CA	U.S. Branch of FBO	0	0	0
Not Exempt	2938198	NORTHBROOK BANK & TRUST COMPANY, NATIONAL ASSOCIATION	NORTHBROOK B&TC NA	NORTHBROOK	IL	National Commercial Bank	57082	25199	0
Not Exempt	2970657	SCHAUMBURG BANK & TRUST COMPANY, NATIONAL ASSOCIATION	SCHAUMBURG B&TC NA	SCHAUMBURG	IL	National Commercial Bank	57103	24150	0
Not Exempt	2972044	NEW YORK BRANCH	NATIONAL BK EGYPT NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	2980209	BARCLAYS BANK DELAWARE	BARCLAYS BK DE	WILMINGTON	DE	State Nonmember Commercial Bank	57203	0	0
Not Exempt	2986407	WESTFIELD BANK, FSB	WESTFIELD BK FSB	WESTFIELD CENTER	OH	Federal Savings Bank	57077	716697	0
Not Exempt	2992547	JOHN DEERE FINANCIAL, F.S.B.	JOHN DEERE FNCL FSB	MIDDLETON	WI	Federal Savings Bank	55237	715685	0
Not Exempt	3017081	NORTHWESTERN MUTUAL WEALTH MANAGEMENT COMPANY	NORTHWESTERN MUT WEALTH MGMT	MILWAUKEE	WI	Federal Savings Bank	57093	716662	0
Not Exempt	3045383	VANGUARD NATIONAL TRUST COMPANY, NATIONAL ASSOCIATION	VANGUARD NAT TC NA	MALVERN	PA	National Non-Depository Trust Co.	57304	24121	0
Not Exempt	3045824	CONNECTICUT BRANCH	GOVERNOR & CO BK IR STAMFOR BR	STAMFORD	CT	U.S. Branch of FBO	0	0	0
Not Exempt	3050369	USB EUROPEAN HOLDINGS COMPANY	USB EUROPEAN HOLDS CO	MINNEAPOLIS	MN	Investment Agreement Corporation	0	0	0
Not Exempt	3057470	MIAMI AGENCY	BANCO DE BOGOTA SA MIAMI AGY	MIAMI	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	3066025	GOLDMAN SACHS TRUST COMPANY, NATIONAL ASSOCIATION, THE	GOLDMAN SACHS TC NA	WILMINGTON	DE	National Non-Depository Trust Co.	57337	24173	0
Not Exempt	3076220	STIFEL BANK	STIFEL BK	SAINT LOUIS	MO	State Member Commercial Bank	57358	0	0
Not Exempt	3076248	STIFEL BANK AND TRUST	STIFEL B&T	SAINT LOUIS	MO	State Member Commercial Bank	57311	0	0
Not Exempt	3135631	BANCO DE CREDITO DEL PERU MIAMI AGENCY	BANCO DE CREDITO MIAMI AGY	CORAL GABLES	FL	U.S. State like Agency of FBO	0	0	0
Not Exempt	3138146	WESTERN ALLIANCE BANK	WESTERN ALLI BK	PHOENIX	AZ	State Member Commercial Bank	57512	0	0
Not Exempt	3150205	WORTHINGTON BANK	WORTHINGTON BK	ARLINGTON	TX	State Member Commercial Bank	57414	0	0
Not Exempt	3150447	CHARLES SCHWAB BANK, SSB	CHARLES SCHWAB BK SSB	WESTLAKE	TX	State Member Savings Bank	57450	0	0
Not Exempt	3152094	NEW YORK BRANCH	BNP PARIBAS FORTIS NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3159262	NEW YORK BRANCH	CHINA CITIC BK INTL NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80112	0
Not Exempt	3159329	PNC DELAWARE TRUST COMPANY	PNC DELAWARE TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3191963	HOUSTON AGENCY	BBVA MEXICO SA INS HOUSTON AGY	HOUSTON	TX	U.S. Agency of FBO	0	0	0
Not Exempt	3202702	OPTUM BANK, INC.	OPTUM BK	DRAPER	UT	State Nonmember Industrial Loan Co.	57408	0	0
Not Exempt	3212149	UBS BANK USA	UBS BK USA	SALT LAKE CITY	UT	State Nonmember Industrial Loan Co.	57565	0	0
Not Exempt	3213735	FIRST FINANCIAL TRUST & ASSET MANAGEMENT COMPANY	FIRST FNCL TR & ASSET MGMT CO	ABILENE	TX	National Non-Depository Trust Co.	57757	0	0
Not Exempt	3216017	BEVERLY BANK & TRUST COMPANY, NATIONAL ASSOCIATION	BEVERLY B&TC NA	CHICAGO	IL	National Commercial Bank	57701	24466	0
Not Exempt	3221468	VERITEX COMMUNITY BANK	VERITEX CMNTY BK	DALLAS	TX	State Member Commercial Bank	57665	0	0
Not Exempt	3224580	COMENITY CAPITAL BANK	COMENITY CAP BK	DRAPER	UT	State Nonmember Industrial Loan Co.	57570	0	0
Not Exempt	3229875	FIRST NATIONAL TRUST COMPANY	FIRST NAT TR CO	HERMITAGE	PA	National Non-Depository Trust Co.	57793	24475	0
Not Exempt	3231234	SCHWAB FAMILY TRUST COMPANY	SCHWAB FAM TR CO	HOUSTON	TX	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3277148	USB AMERICAS HOLDINGS COMPANY	USB AMERS HOLDS CO	MINNEAPOLIS	MN	Investment Agreement Corporation	0	0	0
Not Exempt	3284070	ALLY BANK	ALLY BK	SANDY	UT	State Member Commercial Bank	57803	0	0
Not Exempt	3284397	BEAL BANK USA	BEAL BK USA	LAS VEGAS	NV	State Nonmember Industrial Loan Co.	57833	0	0
Not Exempt	3284829	NORTHLAND TRUST SERVICES, INC.	NORTHLAND TR SVC	MINNEAPOLIS	MN	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3287660	TOYOTA FINANCIAL SAVINGS BANK	TOYOTA FNCL SVG BK	HENDERSON	NV	State Nonmember Industrial Loan Co.	57542	0	0
Not Exempt	3303298	CITIZENS BANK, NATIONAL ASSOCIATION	CITIZENS BK NA	PROVIDENCE	RI	National Commercial Bank	57957	24571	0
Not Exempt	3348888	SERVISFIRST BANK	SERVISFIRST BK	HOMEWOOD	AL	State Nonmember Commercial Bank	57993	0	0



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Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	3353154	BMO HARRIS CENTRAL NATIONAL ASSOCIATION	BMO HARRIS CENT NA	ROSELLE	IL	National Commercial Bank	58216	24536	0
Not Exempt	3357620	HSBC TRUST COMPANY (DELAWARE), NATIONAL ASSOCIATION	HSBC TC DE NA	WILMINGTON	DE	National Commercial Bank	58188	24601	0
Not Exempt	3384952	IDAHO FIRST BANK	IDAHO FIRST BK	MCCALL	ID	State Nonmember Commercial Bank	58095	0	0
Not Exempt	3394278	SALLIE MAE BANK	SALLIE MAE BK	SALT LAKE CITY	UT	State Nonmember Industrial Loan Co.	58177	0	0
Not Exempt	3403170	NORTHERN TRUST COMPANY OF DELAWARE, THE	NORTHERN TC DELAWARE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3404207	OLD PLANK TRAIL COMMUNITY BANK, NATIONAL ASSOCIATION	OLD PLANK TRAIL CMNTY BK NA	NEW LENOX	IL	National Commercial Bank	58314	24646	0
Not Exempt	3465226	HTLF BANK	HTLF BK	DENVER	CO	State Nonmember Commercial Bank	58458	0	0
Not Exempt	3465392	PEGASUS BANK	PEGASUS BK	DALLAS	TX	State Member Commercial Bank	58483	0	0
Not Exempt	3465459	DALLAS AGENCY	ROYAL BK OF CANADA DAL AGY	DALLAS	TX	U.S. Agency of FBO	0	0	0
Not Exempt	3470239	AMERIPRISE BANK, FSB	AMERIPRISE BK FSB	MINNEAPOLIS	MN	Federal Savings Bank	58303	718164	0
Not Exempt	3475083	TRISTATE CAPITAL BANK	TRISTATE CAP BK	PITTSBURGH	PA	State Member Commercial Bank	58457	0	0
Not Exempt	3574650	GOLDMAN SACHS TRUST COMPANY OF DELAWARE, THE	GOLDMAN SACHS TR CO OF DE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3579589	STELLAR BANK	STELLAR BK	HOUSTON	TX	State Nonmember Commercial Bank	58629	0	0
Not Exempt	3637685	FIRST FOUNDATION BANK	FIRST FOUND BK	IRVINE	CA	State Nonmember Commercial Bank	58647	0	0
Not Exempt	3650808	LIVE OAK BANKING COMPANY	LIVE OAK BKG CO	WILMINGTON	NC	State Nonmember Commercial Bank	58665	0	0
Not Exempt	3712461	NEW YORK BRANCH	ICICI BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80123	0
Not Exempt	3783948	RBC BANK (GEORGIA), NATIONAL ASSOCIATION	RBC BK GA NA	ATLANTA	GA	National Commercial Bank	26342	23416	0
Not Exempt	3817393	BRYN MAWR TRUST COMPANY OF DELAWARE, THE	BRYN MAWR TC OF DE	GREENVILLE	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	3823246	NEW YORK BRANCH	CHINA MERCHANTS BK CO NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3856066	HUNTINGTON BANK INTERNATIONAL, INC.	HUNTINGTON BK INTL	COLUMBUS	OH	Investment Agreement Corporation	0	0	0
Not Exempt	3903308	NEW YORK BRANCH	INDUSTRIAL & CB OF CHINA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3927591	NEW YORK BRANCH	CHINA CONSTRUCTION BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3930498	ITAU CHILE NEW YORK BRANCH	BANCO ITAU CHILE NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80126	0
Not Exempt	3938186	BANKUNITED, NATIONAL ASSOCIATION	BANKUNITED NA	MIAMI LAKES	FL	National Commercial Bank	58979	25028	0
Not Exempt	3939521	AMERICAN EXPRESS BANKING CORP.	AMERICAN EXPRESS BKG CORP	NEW YORK	NY	New York Subsidiary of FBO	0	0	0
Not Exempt	3956041	745 SEVENTH AVENUE BRANCH	BARCLAYS BK PLC SEVENTH AVE BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	3958223	RABOBANK NEDERLAND SAINT LOUIS AGENCY	COOPERATIEVE CENTRALE STL AGY	CHESTERFIELD	MO	U.S. Agency of FBO	0	0	0
Not Exempt	4125778	STIFEL TRUST COMPANY DELAWARE, NATIONAL ASSOCIATION	STIFEL TC DE NA	GREENVILLE	DE	National Commercial Bank	59043	24955	0
Not Exempt	4165765	HARRIS WILLIAMS UK HOLDINGS LLC	HARRIS WILLIAMS UK HOLDS LLC	RICHMOND	VA	Investment Agreement Corporation	0	0	0
Not Exempt	4196291	CAPITAL ONE GLOBAL CORPORATION	CAPITAL ONE GLOBAL CORP	MCLEAN	VA	Investment Agreement Corporation	0	0	0
Not Exempt	4223731	NEW YORK BRANCH	LAND BK OF TAIWAN NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4228099	BANCO DAVIVIENDA S.A. MIAMI BRANCH	BANCO DAVIVIENDA SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	4357225	SAN FRANCISCO BRANCH	BANK OF CMNTNS SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	80127	0
Not Exempt	4368351	KEY NATIONAL TRUST COMPANY OF DELAWARE	KEY NAT TC OF DE	WILMINGTON	DE	National Non-Depository Trust Co.	59069	25051	0
Not Exempt	4388788	CAPITAL STREET REIT HOLDINGS, LLC	CAPITAL ST REIT HOLDS LLC	WILMINGTON	DE	Investment Agreement Corporation	0	0	0
Not Exempt	4388797	CAPITAL STREET HOLDINGS, LLC	CAPITAL ST HOLDS LLC	WILMINGTON	DE	Investment Agreement Corporation	0	0	0
Not Exempt	4392806	RAYMOND JAMES CANADIAN ACQUISTION, INC.	RAYMOND JAMES CANADIAN ACQUIST	SAINT PETERSBURG	FL	Investment Agreement Corporation	0	0	0
Not Exempt	4420932	BMO DELAWARE TRUST COMPANY	BMO DE TC	GREENVILLE	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4422730	FIFC EDGE INTERNATIONAL CORP.	FIFC EDGE INTL CORP	LAKE FOREST	IL	Investment Edge Corporation	0	0	0
Not Exempt	4452296	BPAS TRUST COMPANY OF PUERTO RICO	BPAS TC OF PUERTO RICO	SAN JUAN	PR	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4455466	NEW YORK BRANCH	AGRICULTURAL BK OF CHINA NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4461515	CHICAGO BRANCH	BANK OF CHINA CHICAGO BR	CHICAGO	IL	U.S. Branch of FBO	0	80129	0
Not Exempt	4542236	NEW YORK BRANCH	NONGHYUP BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4589857	INVESCO TRUST COMPANY	INVESCO TC	ATLANTA	GA	State Nonmember Non Depository Trust Co.	59078	0	0
Not Exempt	4597740	NORTHERN TRUST COMPANY OF CALIFORNIA	NORTHERN TC OF CA	LOS ANGELES	CA	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4724452	NORTHERN TRUST COMPANY OF NEVADA, THE	NORTHERN TC OF NV	LAS VEGAS	NV	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4725141	SAN FRANCISCO BRANCH	CMB WING LUNG BK SF BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	80132	0
Not Exempt	4726054	NEW YORK BRANCH	CANARA BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4839860	BEACON INVESTMENT ADVISORY SERVICES, INC.	BEACON INV ADVIS SVCS	MORRISTOWN	NJ	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4865177	CHARLES SCHWAB TRUST COMPANY	CHARLES SCHWAB TC	HENDERSON	NV	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4904964	CHARLES SCHWAB TRUST COMPANY OF DELAWARE	CHARLES SCHWAB TC OF DE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4932471	NEW YORK BRANCH	TAIWAN CO-OP BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4934484	1251 BUILDING BRANCH	MIZUHO BK 1251 BLDG BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	4934952	CIBC DELAWARE TRUST COMPANY	CIBC DE TC	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4937243	PNC OHIO TRUST COMPANY	PNC OH TC	CLEVELAND	OH	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	4974145	DISCOVER CARD EXECUTION NOTE TRUST	DISC CARD EXECUTION NOTE TR	NEW CASTLE	DE	State Nonmember Commercial Bank	0	0	0
Not Exempt	4981871	MUFG BANK, LTD. SECONDARY NY BRANCH	MUFG BK SECONDARY NY BR	NEW YORK	NY	U.S. Branch of FBO	0	80139	0
Not Exempt	5050028	INTERNATIONAL BANK OF COMMERCE	INTERNATIONAL BK OF CMRC	OKLAHOMA CITY	OK	State Nonmember Commercial Bank	59093	0	0
Not Exempt	5083316	DESJARDINS FLORIDA BRANCH	FEDERATION DES CAISSES FL BR	HALLANDALE	FL	U.S. Branch of FBO	0	80121	0
Not Exempt	5087752	HUDSON BRANCH	ROYAL BK OF CANADA HUDSON BR	JERSEY CITY	NJ	U.S. Branch of FBO	0	80133	0
Not Exempt	5087949	MB FINANCIAL INTERNATIONAL, INC.	MB FNCL INTL	ROSEMONT	IL	Investment Edge Corporation	0	0	0
Not Exempt	5113866	NEW YORK BRANCH	TAIWAN BUS BK NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	5278251	CHARLES SCHWAB TRUST BANK	CHARLES SCHWAB TR BK	WESTLAKE	TX	State Member Savings Bank	59108	0	0
Not Exempt	5285268	NEW YORK BRANCH	LLOYDS BK CORP MKTS PLC NY BR	NEW YORK	NY	U.S. Branch of FBO	0	0	0
Not Exempt	5326705	ABANCA CORPORACION MIAMI BRANCH	ABANCA CORP BANCARIA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0

Institutions Not Exempt from the Debit Card Interchange Standards

Status	FRB_ID	Legal_Name	Short_Name	City	State	Type	FDIC_ID	OCC_ID	NCUA_ID
Not Exempt	5453843	MIAMI BRANCH	ITAU UNIBANCO SA MIAMI BR	MIAMI	FL	U.S. Branch of FBO	0	0	0
Not Exempt	5557965	FC INTERNATIONAL, INC.	FC INTL	RALEIGH	NC	Investment Edge Corporation	0	0	0
Not Exempt	5584729	HOUSTON BRANCH	FIRST CMRL BK LTD HOUSTON BR	HOUSTON	TX	U.S. Branch of FBO	0	0	0
Not Exempt	5588736	EATON VANCE TRUST COMPANY	EATON VANCE TC	BOSTON	MA	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5616273	SAN FRANCISCO BRANCH	ADYEN NV SAN FRANCISCO BR	SAN FRANCISCO	CA	U.S. Branch of FBO	0	80145	0
Not Exempt	5650398	UMB FOREIGN, LLC	UMB FOR LLC	KANSAS CITY	MO	Investment Edge Corporation	0	0	0
Not Exempt	5655704	RAYMOND JAMES TRUST COMPANY OF NEW HAMPSHIRE	RAYMOND JAMES TC OF NH	PORTSMOUTH	NH	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5686801	HOUSTON BRANCH	TAIWAN CO-OP BK HOUSTON BR	HOUSTON	TX	U.S. Branch of FBO	0	0	0
Not Exempt	5728523	GOLDSTAR TRUST COMPANY	GOLDSTAR TC	JONESBORO	AR	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5802571	UMB DELAWARE, INC.	UMB DE	WILMINGTON	DE	State Nonmember Non Depository Trust Co.	0	0	0
Not Exempt	5805451	WESTERN ALLIANCE TRUST COMPANY, NATIONAL ASSOCIATION	WESTERN ALLI TC NA	PHOENIX	AZ	National Non-Depository Trust Co.	57288	25281	0