



SR003_7: Failed Bank Report

Westbridge Bank and Trust Company

17280 North Outer 40 Road
Chesterfield, MO 63005

(2/7/2006 – 10/15/2010)

Report Objective

This report has **two** objectives, using the bank's **data***:

1. To examine the bank finances in the quarters prior to its failure.
2. To analyze the bank finances using our Key Performance Indicator (KPI) scoring approach to determine if the bank's failure is something we could have predicted.

*Data source: FDIC and company filings.

Bank Background

FDIC Certificate #	58205
Parent Holding Company	BOULEVARD BANCSHARES, INC.
Bank Charter Class	Commercial Bank
Asset Concentration	Commercial Lending Specialization
Product Specialty	Personal and Business Banking Services
Number of Branches	1 (as of September 30, 2010)
Number of Employees	10 (as of September 30, 2010)

Executives

President	Scott Schmid
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What took place?

WestBridge Bank and Trust Company, Chesterfield, MO, was closed by the Missouri Division of Finance, and the Federal Deposit Insurance Corporation (FDIC) was named Receiver. The estimated cost to the FDIC Deposit Insurance Fund is \$18,700,000. Midland States Bank in Effingham, I.L. assumed all of the deposits of WestBridge Bank and Trust Company.

Key Performance Indicators

KPI Summary for 2010 Q3	
Normalized Income Rating	Very Poor
Delinquent Asset Rating	Poor
Asset: Liability Rating	Very Poor
Real Estate Asset Rating*	Moderate
Bankability Composite Score	-17.94**(Very Poor)

Possible ratings: *Excellent, Good, Moderate, Poor, Very Poor.*

*This rating is relevant to the current “financial crisis” fueled by mortgage security backed loans.


**This is out of 100.

Bank Financial Snapshot

Financial Data Overlay (thousands)			
	2009 Q3	2010 Q3	Percentage Change
Assets	\$111,205	\$87,782	↓21.06%
Liabilities	\$106,667	\$87,757	↓17.73%
Net Income	-\$3,690	-\$3,459	↑6.26%

- The average net income change for all FDIC banks was 237.36% in the same period.
- The average net income change for all the commercial lending specialization banks was 217.30% in the same period.
- Compared with the whole industry and other commercial lending specialization banks, Westbridge Bank and Trust Company's change in Net Income was unhealthy (6.26%) during the time period.

Normalized Income Analysis

	2009Q2 	2009Q3	2009Q4	2010Q1	2010Q2	2010Q3
Normalized Income	-1.22%	-0.66%	-1.14%	-1.17%	-1.04%	-1.55%
SD's from Average*	-1.08	-0.58	-0.76	-2.19	-1.65	-2.29
Ranking	Poor	Moderate	Moderate	Very Poor	Poor	Very Poor

- Westbridge Bank and Trust Company had a normalized income of -1.55% in the third quarter of 2010, the quarter before it failed.
- Banks of the same asset concentration hierarchy (commercial lending specialization) had an average normalized income of -0.02%. The standard deviation of the normalized incomes was 0.67%, which means Westbridge Bank and Trust Company was 2.29 SD's below the average.
- Westbridge Bank and Trust Company's normalized income in relation to banks of the same asset concentration hierarchy has shown signs of stress in the last 6 quarters, earning ranks of very poor in 4 of the 6 quarters, suffering loss total to over 6% of its assets.

*Average of banks of the same asset concentration hierarchy



Indicates sign of bank in financial distress

Delinquent Asset Analysis

	2009Q2	2009Q3	2009Q4 	2010Q1	2010Q2	2010Q3
Weighted Delinquent Asset	0.84%	3.06%	7.58%	5.65%	4.37%	4.87%
SD's from Average*	-0.44	0.59	2.81	1.79	1.43	1.54
Ranking	Good	Moderate	Very Poor	Poor	Poor	Poor


- Westbridge Bank and Trust Company had a weighted delinquent assets out of total assets ratio 4.87% in the third quarter of 2010, the quarter before it failed.
- Banks of the same asset concentration hierarchy (commercial lending specialization) had an average weighted delinquent asset of 1.48%. The standard deviation of the delinquent assets was 2.20%, which means that Westbridge Bank and Trust Company was about 1.54 SD's above average.
- Westbridge Bank and Trust Company's weighted delinquent assets ratio has been unhealthy in the last four quarters compared to banks in the same specialization.

*Average of banks of the same asset concentration hierarchy



Indicates sign of bank in financial distress

Real Estate Loan Asset Analysis

	2009Q2 	2009Q3	2009Q4	2010Q1	2010Q2	2010Q3
Real Estate Loan Asset Ratio	52.92%	53.83%	53.87%	52.73%	55.21%	53.48%
SD from Average*	-0.23	-0.14	-0.11	-0.16	0.05	-0.06
Ranking	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate

- Westbridge Bank and Trust Company had a R/A ratio of 53.48% in third quarter of 2010, the quarter before it failed.
- In 2010 Q3, banks of the same asset concentration hierarchy (commercial lending specialization) had an average R/A ratio of 54.30%. The standard deviation of the R/A ratio was 13.22%, which means Westbridge Bank and Trust Company was actually 0.06 SD's below the average, earning the rank of "Moderate".
- Westbridge Bank and Trust Company's R/A ratio performed pretty healthy in the same asset concentration hierarchy.

* Average of banks of the same asset concentration hierarchy



Indicates sign of bank in financial distress

Asset: Liability Analysis

	2009Q2	2009Q3	2009Q4	2010Q1	2010Q2 	2010Q3
Asset: Liability Ratio	104.42%	104.25%	103.37%	102.29%	101.49%	100.03%
Median A/L Ratio*	110.52%	110.57%	110.35%	110.51%	110.65%	110.80%
Ranking	Very Poor	Very Poor	Very Poor	Very Poor	Very Poor	Very Poor

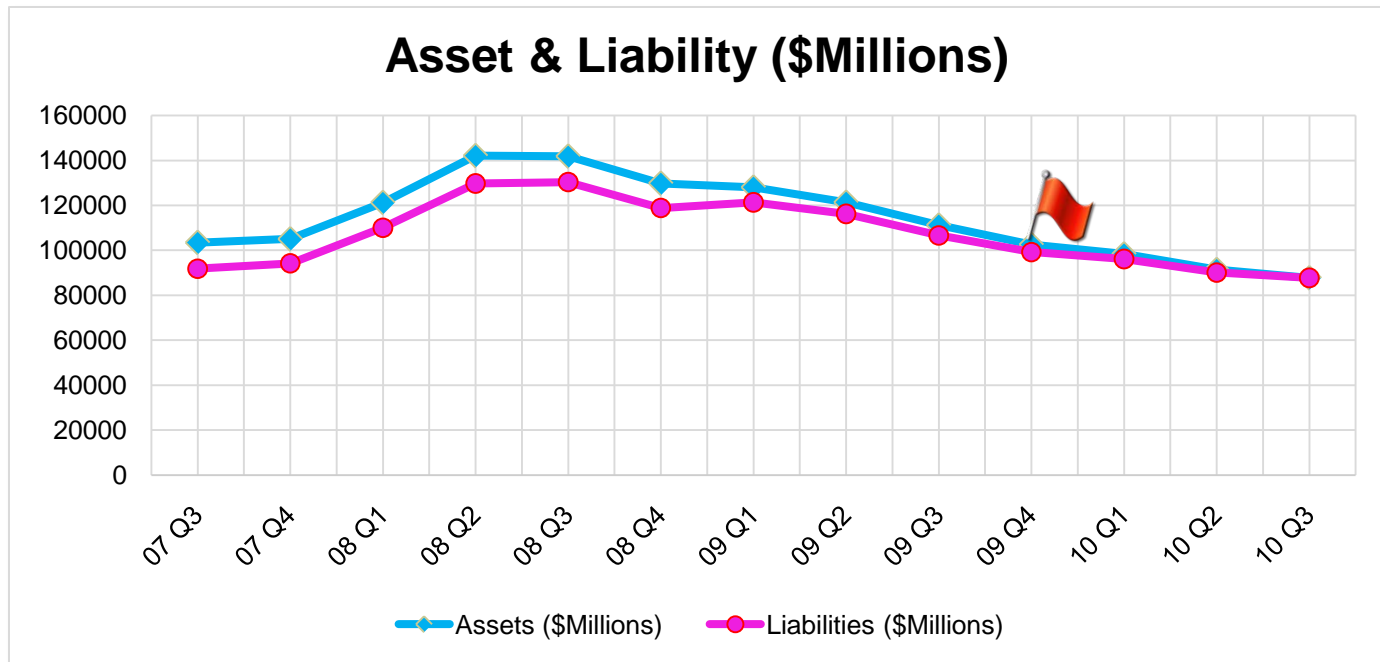
- Westbridge Bank and Trust Company's A/L ratio has been declining over the last 6 quarters and showed strong signs of stress in the last 3 quarters, at 100.03% before it failed.
- The median A/L ratio for all banks in the same asset concentration hierarchy (commercial lending specialization) was 110.80 % in the same period, meaning that Westbridge Bank and Trust Company was more than 8% under the median. The median A/L ratio for all banks in 2010 Q3 was 111.36%.
- Of the 30 banks failed in 2010 Q4, 28 of them had an A/L ratio under 107%.

* Average of banks of the same asset concentration hierarchy



Indicates sign of bank in financial distress

Asset & Liability History

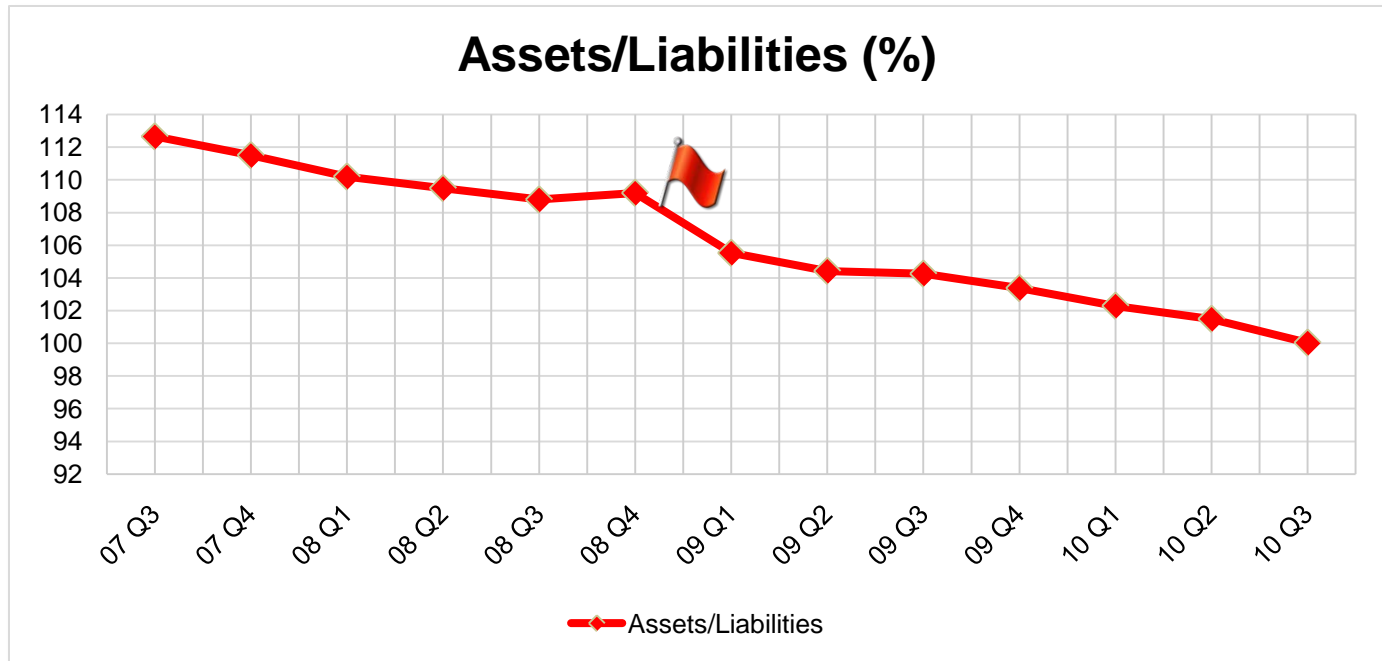


- The difference between asset and liability was getting closer in 09 Q2.



Indicates sign of bank in financial distress

Asset/Liability History

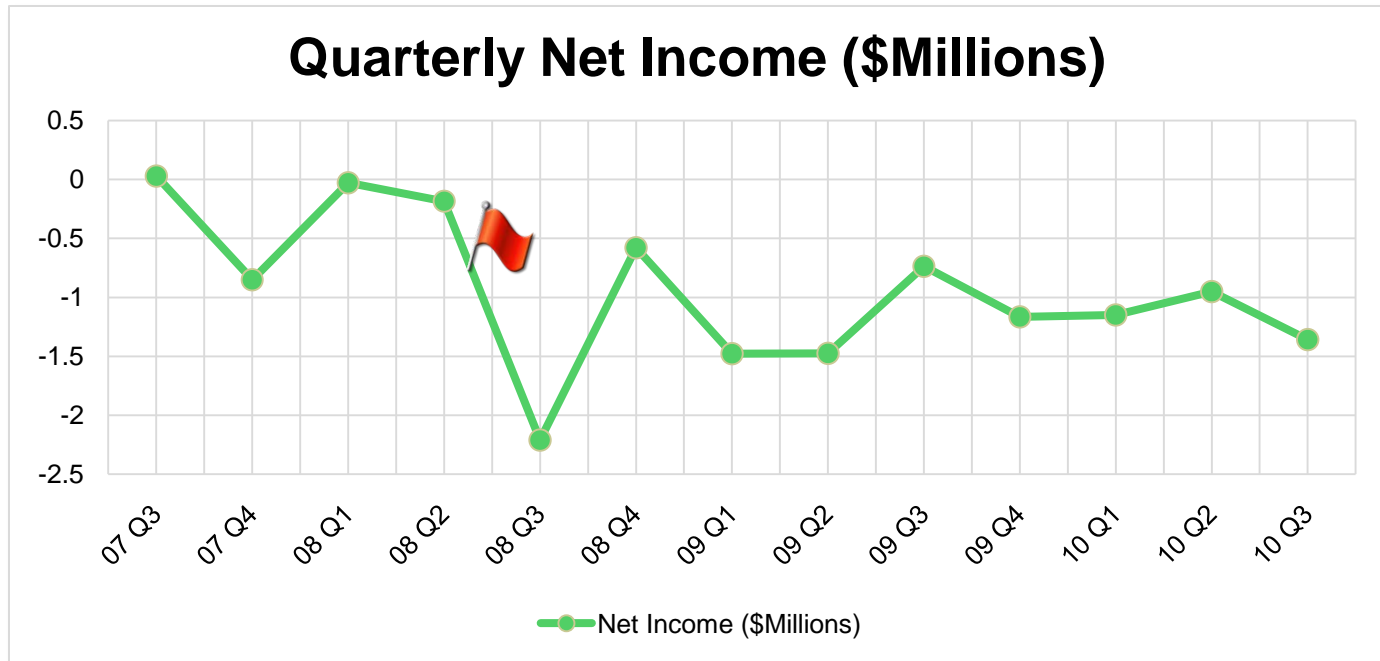


- Bank's 2010 Q3 asset/liability ratio experienced a decrease of 4.05% as compared to the same quarter in 2009.
- The asset/liability ratio for all FDIC banks experienced an increase of 0.39%.
- The asset/liability ratio for all banks in the Commercial Lending Specialization experienced an increase of 0.48%.



Indicates sign of bank in financial distress

Net Income History

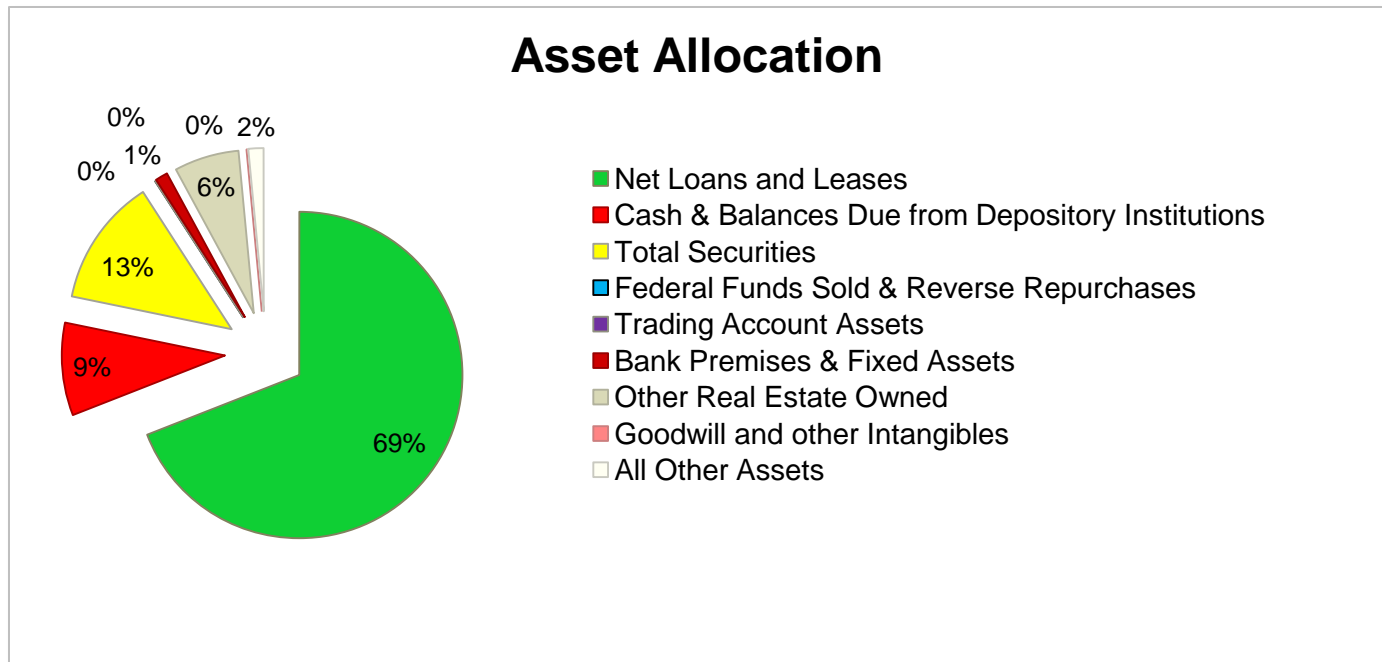


- The bank started reporting losses after 07 Q3.



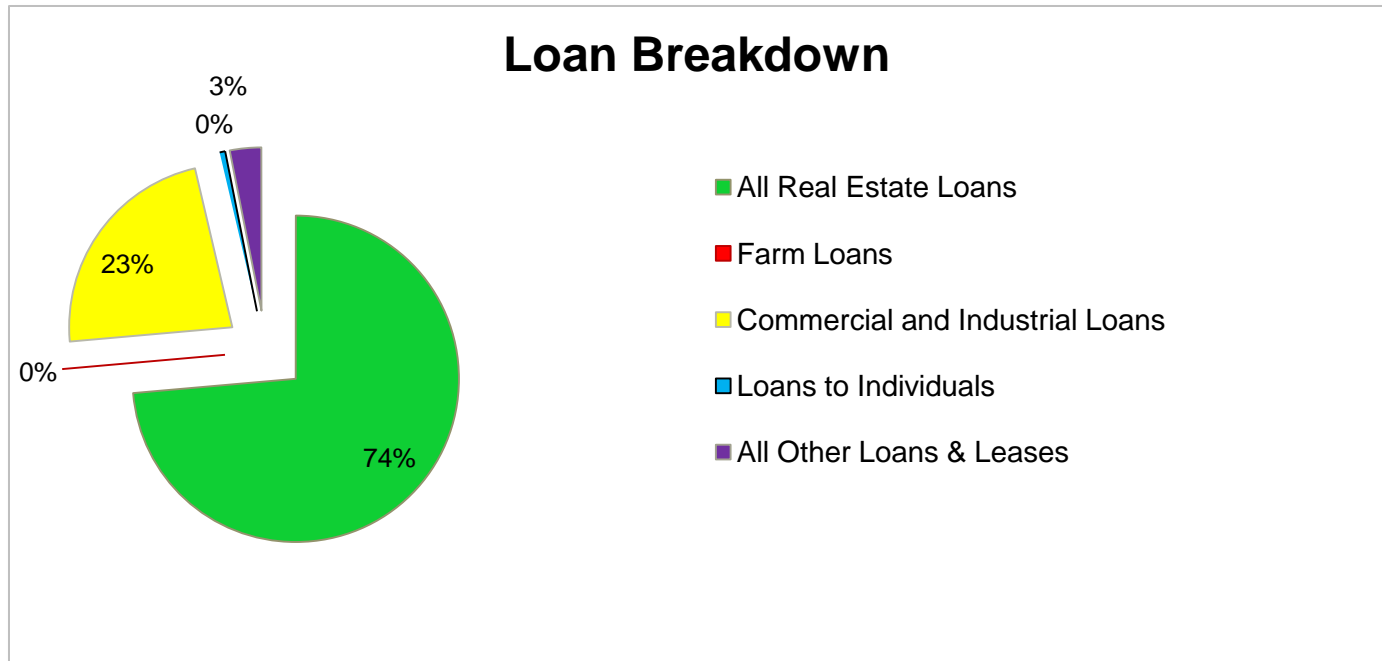
Indicates sign of bank in financial distress

Asset Allocation



- The average percentage of Net Loans for banks of the same Asset Concentration Hierarchy in the third quarter of 2010 was 67.94%.
- The average Net Loan percentage of all banks in the third quarter of 2010 was 62.38%.

Loan Breakdown



- The average percentage of Real Estate Loans for banks of the same Asset Concentration Hierarchy in 2010 Q3 was 54.30%. The average percentage for all banks in 2010 Q3 was 46.58%.

Events Timeline

- Apr 1, 10** - The SEC announced that Kathleen Griffin has been named the agency's first Chief Compliance Officer - the latest in a series of measures undertaken to strengthen the SEC's internal compliance program.
- Apr 7, 10** - The SEC proposed rules that would revise the disclosure, reporting and offering process for asset-backed securities (ABS) to better protect investors in the securitization market.
- Apr 13, 10** - The Board of Directors of the FDIC approved an interim rule to extend the Transaction Account Guarantee (TAG) program to December 31, 2010.
- Apr 13, 10** - The Board of Directors of the Federal Deposit Insurance Corporation (FDIC) approved a Notice of Proposed Rulemaking (NPR) to revise the deposit insurance assessment system for large institutions, which pose unique and concentrated risks to the Deposit Insurance Fund.
- Apr 14, 10** - The SEC voted to propose the creation of a large trader reporting system that would enhance its ability to identify large market participants, collect information on their trades, and analyze their trading activity.
- Apr 14, 10** - The U.S. Department of the Treasury and the Department of Housing and Urban Development released March data for the Administration's Home Affordable Modification Program (HAMP).
- Apr 15, 10** - Eight federal regulators today released an Online Form Builder that financial institutions can download and use to develop and print customized versions of a model consumer privacy notice.

Events Timeline

- Apr 23, 10** - The Federal Reserve Board on Friday announced that it will hold four public hearings, beginning in July, on potential revisions to Regulation C, which implements the Home Mortgage Disclosure Act. The act requires mortgage lenders to provide detailed annual reports of their mortgage lending activity to regulators and the public. Consumers, community and consumer organizations, mortgage lenders, and other interested parties will be invited to participate in the hearings.
- Apr 29, 10** - The Federal Financial Institutions Examination Council (FFIEC) released the revised Bank Secrecy Act/Anti-Money Laundering (BSA/AML) Examination Manual.
- Apr 30, 10** - The federal financial regulatory agencies issued final guidance to address the risks associated with funding and credit concentrations arising from correspondent relationships. A correspondent relationship occurs when a financial organization provides another financial organization with service related to deposits, lending, or other activities.
- May 5, 10** - SEC staff would conduct a public seminar next month to help mutual funds comply with new rules that require them to file data in the risk/return summary section of the prospectus using Extensible Business Reporting Language (XBRL), which can provide investors with quicker access to the data they want in a format that is easily used, searched, and analyzed.
- May 6, 10** - The U.S. Department of the Treasury released its monthly comprehensive update on Build America Bonds issuances, including state-by-state data, showing nearly \$97 billion have been issued through April 30, 2010.
- May 11, 10** - SEC Chairman Mary Schapiro and Commodity Futures Trading Commission Chairman Gary Gensler announced the formation of a joint committee that will address emerging regulatory issues.

Events Timeline

- May 11, 10** - The FDIC issued for public comment a proposed rule that would require certain identified insured depository institutions ("IDIs") that are subsidiaries of large and complex financial parent companies to submit to the FDIC analysis, information, and contingent resolution plans that address and demonstrate the IDI's ability to be separated from its parent structure, and to be wound down or resolved in an orderly fashion.
- May 11, 10** - The Board of Directors of the Federal Deposit Insurance Corporation (FDIC) approved a Notice of Proposed Rulemaking (NPR) to clarify the safe harbor protection in a conservatorship or receivership for financial assets transferred by an insured depository institution (IDI) in connection with a securitization or participation.
- May 12, 10** - U.S. Treasury Secretary Timothy Geithner and European Commissioner Michel Barnier met today and reaffirmed their strong determination to cooperate closely in strengthening the global financial system and in putting in place the G-20 financial reform agenda.
- May 17, 10** - The U.S. Department of the Treasury and the Department of Housing and Urban Development (HUD) released April data for the Administration's Home Affordable Modification Program (HAMP) showing permanent modifications for almost 300,000 homeowners - an increase of 68,000 or almost 13 percent over March.
- May 18, 10** - The SEC announced that in response to the market disruption on May 6, the national securities exchanges and the Financial Industry Regulatory Authority (FINRA) are filing proposed rules under which they would pause trading in certain individual stocks if the price moves 10 percent or more in a five-minute period.

Events Timeline

- May 20, 10** - Commercial banks and savings institutions insured by the Federal Deposit Insurance Corporation (FDIC) reported an aggregate profit of \$18.0 billion in the first quarter of 2010, a \$12.5 billion improvement from the \$5.6 billion the industry earned in the first quarter of 2009, but still well below historical norms for quarterly profits.
- May 26, 10** - The SEC voted unanimously to approve rule changes improving the quality and timeliness of municipal securities disclosure.
- May 26, 10** - The SEC proposed a new rule that would require the self-regulatory organizations (SROs) to establish a consolidated audit trail system that would enable regulators to track information related to trading orders received and executed across the securities markets.
- May 26, 10** - The Federal Deposit Insurance Corporation (FDIC) and the China Banking Regulatory Commission (CBRC) announced their agreement to enhance cooperation and coordination on cross border resolutions.
- Jun 3, 10** - The U.S. Department of the Treasury released its monthly comprehensive update on Build America Bonds issuances, including state-by-state data, showing \$106 billion has been issued through May 31, 2010. Build America Bond issuers benefit from substantial savings in borrowing costs when compared to issuing tax-exempt debt.
- Jun 10, 10** - The SEC approved rules that will require the exchanges and FINRA to pause trading in certain individual stocks if the price moves 10 percent or more in a five-minute period. The rules, which were proposed by the national securities exchanges and FINRA and published for public comment, come in response to the market disruption of May 6.

Events Timeline

- Jun 14, 10** - The U.S. SEC, Quebec Autorite des marches financiers (AMF) and Ontario Securities Commission (OSC) announced a comprehensive arrangement to facilitate their supervision of regulated entities that operate across the U.S. - Canadian border.
- Jun 15, 10** - The SEC voted unanimously to propose rule amendments to help clarify the meaning of a date in a target date fund's name and enhance the information provided to investors in these funds as they invest for retirement.
- Jun 15, 10** - The Federal Reserve Board approved a final rule to protect credit card users from unreasonable late payment and other penalty fees and to require credit card issuers to reconsider interest rate increases imposed since the beginning of last year.
- Jun 17, 10** - The federal bank and thrift regulatory agencies announced a series of upcoming public hearings on modernizing the regulations that implement the Community Reinvestment Act (CRA). Interested parties are invited to provide testimony and written comments.
- Jun 17, 10** - The federal bank and thrift regulatory agencies announced a proposed change to the Community Reinvestment Act (CRA) regulations to support stabilization of communities affected by high foreclosure levels.
- Jun 17, 10** - The Federal Reserve Board announced the discussion topics for its upcoming public hearings on potential revisions to Regulation C, which implements the Home Mortgage Disclosure Act (HMDA).
- Jun 18, 10** - Community Security Bank in New Prague lost \$4.79 million during the first three months of 2010, according to revised financial statements filed with the Federal Deposit Insurance Corp. on June 7.

Events Timeline

- Jun 21, 10** - The Federal Reserve, the Office of the Comptroller of the Currency (OCC), the Office of Thrift Supervision (OTS), and the Federal Deposit Insurance Corporation (FDIC) issued a final guidance to ensure that incentive compensation arrangements at financial organizations take into account risk and are consistent with safe and sound practices. The guidance was originally proposed by the Federal Reserve last year.
- Jun 22, 10** - The Board of Directors of the Federal Deposit Insurance Corporation (FDIC) adopted a final rule extending the Transaction Account Guarantee (TAG) program for six months, from July 1, 2010 through December 21, 2010.
- Jun 23, 10** - State Housing Finance Agencies (HFAs) in Arizona, California, Florida, Michigan, and Nevada can begin to use \$1.5 billion in "Hardest Hit Fund" foreclosure-prevention funding under plans approved today by the Obama Administration.
- Jun 24, 10** - The Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency issued the host state loan-to-deposit ratios that the banking agencies will use to determine compliance with section 109 of the Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994.
- Jun 28, 10** - The Federal Reserve Board announced that it will implement changes to its Payment System Risk (PSR) policy in early 2011. A specific implementation date will be announced at least 90 days in advance.
- Jun 30, 10** - The SEC voted unanimously to approve new rules to significantly curtail the corrupting influence of "pay to play" practices by investment advisers.
- Jun 30, 10** - WestBridge Bank and Trust Company had approximately \$91.5 million in total assets and \$72.5 million in total deposits.

Events Timeline

- Jun 30, 10** - The SEC published for public comment proposals by the national securities exchanges and FINRA to expand a recently adopted circuit breaker program to include all stocks in the Russell 1000 Index and certain exchange-traded funds.
- Jul 2, 10** - SEC Chairman Mary Schapiro and Japan Financial Services Agency (JFSA) Commissioner Katsunori Mikuniya met in Washington, D.C.. The Dialogue is to provide a forum whereby the senior officials of the two agencies can meet to identify and discuss issues of common concern affecting the U.S. and Japanese capital markets and promote areas of future collaboration.
- Jul 9, 10** - The Federal Reserve Board announced the agenda and panelists for the first of four public hearings this year on potential revisions to Regulation C, which implements the Home Mortgage Disclosure Act (HMDA). The event will be held July 15 at the Federal Reserve Bank of Atlanta.
- Jul 10, 10** - The Board of Directors of the FDIC voted to revise its Memorandum of Understanding with the primary federal banking regulators to enhance the existing backup authorities over insured depository institutions that the FDIC does not directly supervise.
- Jul 12, 10** - The Board of Directors of the Federal Deposit Insurance Corporation (FDIC) voted to revise its Memorandum of Understanding with the primary federal banking regulators to enhance the FDIC's existing backup authorities over insured depository institutions that the FDIC does not directly supervise.
- Jul 14, 10** - The federal financial regulatory agencies and the Conference of State Bank Supervisors issued a statement emphasizing that financial institutions are encouraged to work with their customers and consider measures to assist creditworthy borrowers affected by oil spill in the Gulf of Mexico and Deepwater Horizon Mobile Offshore Drilling Unite explosion.

Events Timeline

- Jul 14, 10** - The Securities and Exchange Commission voted to issue a concept release seeking public comment on the U.S. proxy system and asking whether rule revisions should be considered to promote greater efficiency and transparency.
- Jul 15, 10** - The Securities and Exchange Commission announced that Goldman, Sachs & Co. will pay \$550 million and reform its business practices to settle SEC charges that Goldman misled investors in a subprime mortgage CDO.
- Jul 16, 10** - The Securities and Exchange Commission's Division of Corporation Finance that reviews public company filings created three specialized offices to enhance its disclosure review and policy operations, focusing on large financial institutions, asset-backed securities and other structured products, and securities offering trends.
- Jul 17, 10** - The FDIC and the other federal banking regulators are updating their Community Reinvestment Act (CRA) rules to reflect recent changes in the financial industry. The CRA encourages institutions to meet the credit needs of their entire communities.
- Jul 20, 10** - Federal Reserve announced an agreement with the Treasury Department regarding a reduction of credit protection provided for the Term Asset-Backed Securities Loan Facility (TALF).
- Jul 21, 10** - President Barack Obama signed the Dodd-Frank Wall Street Reform and Consumer Protection Act, which, in part, permanently raises the current standard maximum deposit insurance amount to \$250,000. The standard maximum insurance amount of \$100,000 had been temporarily raised to \$250,000 until December 31, 2013.

Events Timeline

- Jul 21, 10** - The Securities and Exchange Commission proposed measures aimed to improve the regulation of mutual fund distribution fees and provide better disclosure for investors. It would replace rule 12b-1 with new rules.
- Jul 21, 10** - The Securities and Exchange Commission adopted changes to the disclosure document that SEC-registered investment advisers must provide to their clients and prospective clients.
- Jul 23, 10** - The U.S. Department of the Treasury announced its continued sale of its holdings of Citigroup common stock.
- Jul 27, 10** - The Obama Administration announced expanded opportunities for public engagement on the future of our nation's housing finance system, including Fannie Mae and Freddie Mac.
- Jul 28, 10** - Federal agencies issued final rules to implement the Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (S.A.F.E. Act) requirements for registration of mortgage loan originators. The Act requires residential mortgage loan originators to be registered with the Nationwide Mortgage Licensing System and Registry.
- Jul 30 2010** - The U.S. Department of the Treasury announced that the United States, the International Financial Institutions (IFIs), and other donors have together reached the goal of eliminating the total debt stock that Haiti owed to the IFIs at the time of the January earthquake.
- Aug 2, 10** - The U.S. Department of the Treasury announced its estimates of net marketable borrowing for the July - September 2010 and the October - December 2010 quarters. Treasury expects to issue \$350 billion in net marketable debt during the July - September 2010 quarter, while it expects to issue \$380 billion from October - December 2010.

Events Timeline

- Aug 4, 10** - State Housing Finance Agencies (HFAs) in North Carolina, Ohio, Oregon, Rhode Island and South Carolina can start using \$600 million in foreclosure-prevention assistance from the Housing Finance Agency Innovation Fund for the Hardest Hit Housing Markets under plans approved by the Obama Administration.
- Aug 10, 10** - The FDIC Board of Directors today approved a pilot program to evaluate the feasibility of insured depository institutions offering safe, low-cost transactional and savings accounts. Under the pilot, participating institutions will offer electronic deposit accounts with product features identified in the FDIC Model Safe Accounts Template.
- Aug 16, 10** - The Federal Reserve Board announced final rules to implement a statutory amendment to the Truth in Lending Act requiring that consumers receive notice when their mortgage loan has been sold or transferred.
- Aug 16, 10** - The Federal Reserve Board issued an interim rule that revises the disclosure requirements for closed-end mortgage loans under Regulation Z (Truth in Lending).
- Aug 16, 10** - The Federal Reserve Board proposed a rule to revise the escrow account requirements for higher-priced, first-lien "jumbo" mortgage loans.
- Aug 18, 10** - The Securities and Exchange Commission charged the State of New Jersey with securities fraud for misrepresenting and failing to disclose to investors in billions of dollars worth of municipal bond offerings that it was underfunding the state's two largest pension plans.
- Aug 20, 10** - The U.S. Department of Housing and Urban Development and the U.S. Department of the Treasury released the August edition of the Obama Administration's Housing Scorecard. In July, housing prices remained level after 30 straight months of decline, while some price predictions have improved.

Events Timeline

- Aug 22, 10** - New Federal Reserve Board rules restrict inactivity fees and generally prohibit expiration dates of less than five years on retail gift cards used to make purchases at stores and service providers.
- Aug 25, 10** - The Securities and Exchange Commission changed the federal proxy and other rules to facilitate the rights of shareholders to nominate directors to a company's board.
- Aug 30, 10** - Commercial banks and savings institutions insured by the Federal Deposit Insurance Corporation (FDIC) reported an aggregate profit of \$21.6 billion in the second quarter of 2010.
- Sep 2, 10** - The Securities and Exchange Commission adopted a temporary rule requiring municipal advisors to register with the SEC by October 1, a deadline established by the newly-enacted Dodd-Frank Wall Street Reform and Consumer Protection Act.
- Sep 2, 10** - The U.S. Department of the Treasury will launch a new pilot program to help capitalize on tax refund season as an opportunity to provide unbanked and underbanked Americans.
- Sep 7, 10** - The FDIC released a report on the use of alternative financial services (AFS) among U.S. households, including usage at a state level ranging from slightly more than one-quarter to almost one-half.
- Sep 8, 10** - The Federal Reserve Board authorized ongoing small-value offerings of term deposits under the Term Deposit Facility (TDF).
- Sep 12, 10** - The U.S. federal banking agencies supported the agreement reached at the September 12, 2010, meeting of the G-10 Governors and Heads of Supervision (GHOS).

Events Timeline

- Sep 13, 10** - The FDIC offers Smaller Dollar/Geographically Focused Loan Pools, aimed to provide notice to individuals or business entities that may be interested in structured transactions. In these transactions, the FDIC contributes loans to a newly formed entity, and then auctions off an equity interest in the LLC.
- Sep 17, 10** - The Securities and Exchange Commission proposed measures that require public companies to disclose additional information to investors about their short-term borrowing arrangements.
- Sep 17, 10** - The U.S. Department of the Treasury announced that it priced a secondary public offering of 13,049,451 warrants to purchase common stock of Lincoln National Corporation (the "Company") at \$16.60 per warrant. The aggregate net proceeds to Treasury from the offering are expected to be \$213,671,319.
- Sep 21, 10** - Officials at the Federal Reserve signaled that they were worried that the slow-moving economic recovery could be undermined by very low rates of inflation, and hinted strongly that it might resume buying vast amounts of government debt to spur the recovery.
- Sep 27, 10** - The FDIC increased its list of problem banks by 6% to 829 in the second quarter. The top executive at Keefe, Bruyette & Woods said that, between failures and consolidation, the total number of U.S. banks could fall to 5,000 in the next decade from the current 7,932.
- Sep 28, 10** - The final rule implementing the federal registration provisions of the Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (the SAFE Act) takes effect on October 1, 2010
- Sep 29, 10** - The Federal Reserve Board announced that it will implement changes to its Payment System Risk (PSR) policy on March 24, 2011.

Events Timeline

- Sep 30, 10** - Federal Reserve announced it will offer \$5 billion in 28-day term deposits through its Term Deposit Facility on October 4, 2010.
- Sep 30, 10** - Federal Reserve Chairman Ben S. Bernanke said the central bank has a duty to aid the economy as U.S. unemployment holds near 10 percent without offering new details on what the Fed may do about it.
- Sep 30, 2010** - Treasury Announces Further Sales of Citigroup Securities and Cumulative Return to Taxpayers of \$41.6 Billion.
- Sep 30, 10** - Treasury Announces Special Financial Stabilization Initiative Investments of \$570 Million in 84 Community Development Financial Institutions in Underserved Areas.
- Oct 1, 10** - Financial Stability Oversight Council holds its inaugural meeting at US Treasury. The Council will provide, for the first time, comprehensive oversight over the stability of our nation's financial system.
- Oct 8, 10** - The Board of Directors of the FDIC voted to approve through notational vote a proposed rule clarifying how the agency would treat certain creditor claims under the new orderly liquidation authority established under the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- Oct 12, 10** - The FDIC announces the appointment of Mark Pearce as director of the newly-established Division of Depositor and Consumer Protection (DCP).
- Oct 12, 10** - SEC proposes a new rule, based on requirements under the Dodd-Frank Wall Street Reform and Consumer Protection Act, that would help those managing their own family's financial portfolios determine whether their "family offices" can continue to be excluded from the Investment Advisers Act of 1940.

Events Timeline

- Oct 13, 10** - SEC issues a proposal to enhance disclosure to investors in the asset-backed securities market. It requires issuers of asset-backed securities (ABS) to perform a review of the assets underlying the securities and publicly disclose information relating to the review, as well as make publicly available the findings and conclusions of any third-party due diligence report.
- Oct 15, 10** - WestBridge Bank and Trust Company was closed by the Missouri Division of Finance, which appointed the FDIC as receiver. The FDIC entered into a purchase and assumption agreement with Midland States Bank, Effingham, Illinois, to assume all of the deposits of WestBridge Bank and Trust Company, which will continue to be insured by the FDIC.
- Oct 18, 10** - SEC proposes rules that would enable shareholders to cast advisory votes on executive compensation and "golden parachute" arrangements. The rules are called for by Section 951 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- Oct 18, 10** - Federal Reserve announces an interim final rule to ensure that real estate appraisers are free to use their independent professional judgment in assigning home values without influence or pressure from those with interests in the transactions. The rule also seeks to ensure that appraisers receive customary and reasonable payments for their services.
- Oct 19, 10** - In response to changes to the FDIC's authority to manage the Deposit Insurance Fund contained in the Dodd-Frank Wall Street Reform and Consumer Protection Act, the FDIC voted to propose a comprehensive, long-range plan for deposit insurance fund management with the goals of maintaining a positive fund balance, even during periods of large fund losses, and maintaining steady, predictable assessment rates throughout economic and credit cycles.

Events Timeline

- Oct 29, 10** - SEC's Office of the Chief Accountant and Division of Corporation Finance today published their first progress report on the Work Plan related to global accounting standards.
- Nov 1, 10** - The US Treasury announces its current estimates of net marketable borrowing for the Oct - Dec 2010 (to issue \$362 billion in net marketable debt, which is \$17 billion lower than announced in Aug 2010) and Jan - March quarters (to issue \$431 billion in net marketable debt).
- Nov 3, 10** - SEC proposes a new whistleblower program to reward individuals who provide the agency with high-quality tips that lead to successful enforcement actions under the Dodd-Frank Act.
- Nov 4, 10** - SEC extends new short sale rule from Nov. 10, 2010 to Feb. 28, 2011. The new short sale rule will restrict the prices at which a stock can be sold short if the stock's price drops 10 percent or more in one day.
- Nov 5, 10** - FDIC selects nine banks to participate in a case study in its model safe accounts pilot for safe and low-cost transactional and savings account products. These accounts are largely electronic.
- Nov 8, 10** - SEC approves new rules proposed by the exchanges and FINRA to strengthen the minimum quoting standards for market makers and effectively prohibit "stub quotes" in the U.S. equity markets.
- Nov 9, 10** - FDIC approves temporary unlimited deposit insurance coverage for noninterest-bearing transaction accounts, as a final rule to implement section 343 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. It will be effective on Dec. 31, 2010 and end on Dec. 31, 2012.

Events Timeline

- Nov 17, 10** - Federal Reserve issues guidelines for evaluating proposals by large bank holding companies (BHCs) to undertake capital actions in 2011, such as increasing dividend payments or repurchasing or redeeming stock.
- Nov 18, 10** - SEC proposes new rules, which would implement provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, to strengthen the SEC's oversight of investment advisers.
- Nov 19, 10** - SEC proposes new rules that would require security-based swap data repositories (SDRs) to register with the SEC. These new rule also lay out other requirements with which SDRs must comply.
- Nov 19, 10** - SEC proposes new rules entailing how security-based swap transactions should be reported and publicly disseminated, under Title VII of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- Dec 14, 10** - FDIC sets the insurance fund's designated reserve ratio (DRR) at 2 percent of estimated insured deposits.
- Dec 13, 10** - The Federal Reserve proposed two rules that would expand the coverage of consumer protection regulations to credit transactions and leases of higher dollar amounts. The proposed rules would amend Regulation Z (Truth in Lending) and Regulation M (Consumer Leasing) to implement a provision of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).

Events Timeline

- Dec 14, 10** - FDIC approves an interagency proposal to set risk-based capital floor for large financial institutions, as provisions of Section 171 (known as Collins Amendment) of the Dodd-Frank Wall Street Reform and consumer Protection act.
- Dec 15, 10** - The FDIC appoints Jim Wigan as the Director of the newly established Office of Complex Financial Institutions (CFI).
- Dec 15, 10** - SEC proposes rules required under the Dodd-Frank Act that would set out the way in which clearing agencies provide information to the SEC about security-based swaps that the clearing agencies plan to accept for clearing. This information is designed to aid the SEC in determining whether such security-based swaps are, in fact, required to be cleared.
- Dec 22, 10** - FDIC releases that the domestic and international legislative and regulatory reforms will end reliance on trust preferred securities as they have a heightened risk profile and failed more often than those whose tier 1 capital did not include these instruments.

Report Summary – *Surprise?*

Based on the methods with which we analyzed Westbridge Bank and Trust Company, its failure was ***not a surprise***.

Here are the indications that Westbridge Bank and Trust Company should fail:

- 1) **Westbridge Bank and Trust Company experienced a loss in every of the last 6 quarters, lost total to over 6% of its assets.**
- 2) **The bank's asset to liability ratio dropped to 100.03% the quarter before it failed.**
- 3) **Westbridge Bank and Trust Company had a bankability composite score of -17.94 the quarter before it failed, indicating the bank's very poor overall financial health and likelihood to fail.**

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