

SR003_7: Failed Bank Report

Silverton Bank, National Association

3284 Northside Pkwy NW
Atlanta, GA 30327

(2/3/1986 – 5/1/2009)

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 #	26535
Parent Holding Company	SILVERTON FINANCIAL SERVICES, INC.
Bank Charter Class	National Bank
Asset Concentration	Commercial Lending Specialization
Product Specialty	Commercial Banking Services, Card Services, Investment Banking Services, Consulting Services
Number of Branches	1 (as of March 31, 2009)
Number of Employees	389 (as of March 31, 2009)

Executives

CEO/President	Christopher B. Maddox
Chairman	Michael Carlton

What took place?

Silverton Bank, N.A., Atlanta, GA was closed by the Office of the Comptroller of the Currency (OCC) on May 1st, 2009. The Federal Deposit Insurance Corporation (FDIC) was named Receiver. The estimated cost to the FDIC Deposit Insurance Fund is \$1,300,000,000, compared to the average cost of \$389,206,944. Silverton Bank could not find a buyer for its deposits and assets, so the FDIC created a bridge bank so the company will continue operating.

Bank Financial Snapshot

Financial Data Overlay (thousands)			
	2008 Q1	2009 Q1	Percentage Change
Assets	\$ 2,710,240	\$ 4,157,246	↑ 53.4%
Liabilities	\$ 2,483,741	\$ 4,108,061	↑ 65.4%
Net Income	\$ 3,244	-\$ 146,423	↓ 4,614%

- The average net income change for all FDIC banks was -59.6% in the same period.
- The average net income change for all the commercial lending specialization banks was -107.5% in the same period.
- Compared with the whole industry and other commercial lending specialization banks, Silverton Bank's decline from Net Income is abnormally large (-4614%) during 2009.

Key Performance Indicators


KPI Summary for 2009 Q1	
Normalized Income Rating	Very Poor
Delinquent Asset Rating	Good
Asset: Liabilities Rating	Very Poor
Real Estate Asset Rating*	Excellent
Bankability Composite Score	-9.23** (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.

Normalized Income Analysis

	2007Q4	2008Q1	2008Q2	2008Q3	2008Q4	2009Q1 
Normalized Income	0.30%	0.12%	-0.15%	-0.17%	-0.79%	-3.52%
SD's from Average*	0.335	0.0194	-0.283	-0.138	-0.543	-6.06
Ranking	Moderate	Moderate	Moderate	Moderate	Moderate	Very Poor


- Silverton Bank had a normalized income of -3.52% in the first quarter of 2009, the quarter before it failed.
- Banks of the same asset concentration hierarchy (commercial lending specialization) had an average normalized income of -0.01%. The standard deviation of the normalized incomes was 0.58%, which means that Silverton Bank was 6 SD's below the average.
- Since the third quarter of 2008, Silverton Bank's normalized income in relation to banks of the same asset concentration hierarchy has declined each quarter.

*Average of banks of the same asset concentration hierarchy



Indicates sign of bank in financial distress

Delinquent Asset Analysis

	2007Q4	2008Q1 	2008Q2	2008Q3	2008Q4	2009Q1
Delinquent Asset	1.7488%	3.6688%	2.4515%	2.0313%	2.8443%	1.0061%
SD's from Average*	0.22	1.13	0.57	0.28	0.52	-0.38
Ranking	Moderate	Poor	Moderate	Moderate	Moderate	Good

- Silverton Bank had a delinquent assets out of total assets ratio 1% in the first quarter of 2009, the quarter before it failed.
- Banks of the same asset concentration hierarchy (commercial lending specialization) had an average delinquent asset of 1.9142%. The standard deviation of the delinquent assets was 2.37%, which means that Silverton Bank was about 0.4 SD's below the average.
- Except the first quarter of 2008, Silverton Bank's delinquent assets ratio has been stable and stayed around the average since 2007 Q4. From the perspective of delinquent assets ratio, there were no signs of the bank's failure.

*Average of banks of the same asset concentration hierarchy



Indicates sign of bank in financial distress

Real Estate Loan Asset Analysis

	2007Q4	2008Q1	2008Q2	2008Q3	2008Q4	2009Q1
Real Estate Loan Asset Ratio	46.08%	45.27%	47.13%	49.79%	45.18%	34.89%
SD from Average*	-0.62	-0.68	-0.61	-0.47	-0.79	-1.49
Ranking	Moderate	Moderate	Moderate	Moderate	Good	Excellent

- Silverton Bank, National Association had a 34.89% of R/A ratio in 09 Q1, the quarter before it failed.
- In 09 Q1, banks of the same asset concentration hierarchy (commercial lending specialization) had an average R/A ratio of 56.23%. The standard deviation of the R/A ratio was 14.37%, which means that Silverton Bank, National Association was 1.49 SD's below the average.

* Average of banks of the same asset concentration hierarchy

Asset: Liability Analysis

	2007Q4	2008Q1	2008Q2	2008Q3 	2008Q4	2009Q1
Asset: Liability Ratio	109.19%	109.12%	108.91%	107.92%	106.58%	101.20%
Median A/L Ratio*	110.95%	110.93%	110.69%	110.65%	110.52%	110.57%
Ranking	Poor	Poor	Poor	Poor	Very Poor	Very Poor

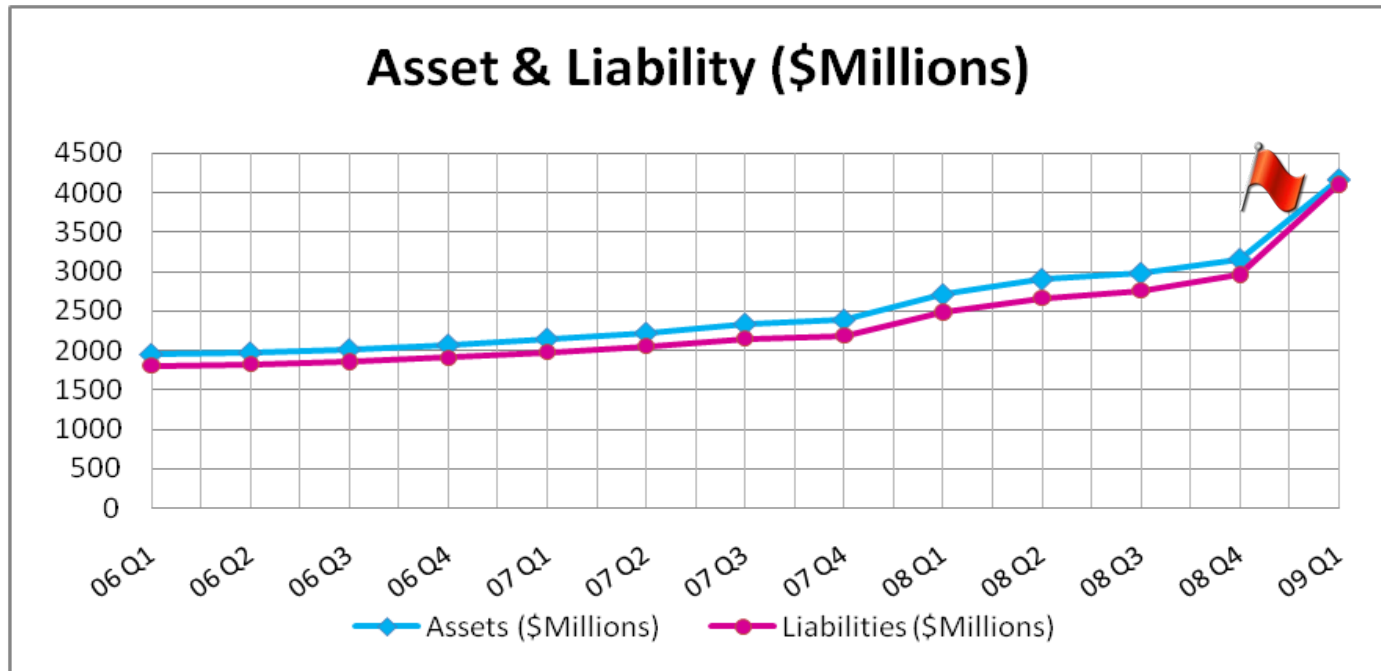
- Silverton Bank, National Association experienced decreasing A/L ratio in all 6 quarters.
- The bank fell into the worst ranking in 08 Q4.
- Of the banks failed in Q2 09, 87.50% of them had an A/L ratio under 107%.
- Of the bank with an A/L ratio under 106% in Q1 09, 10.75% failed in the subsequent quarter.

*Median of banks of the same asset concentration hierarchy



Indicates sign of bank in financial distress

Asset & Liability History

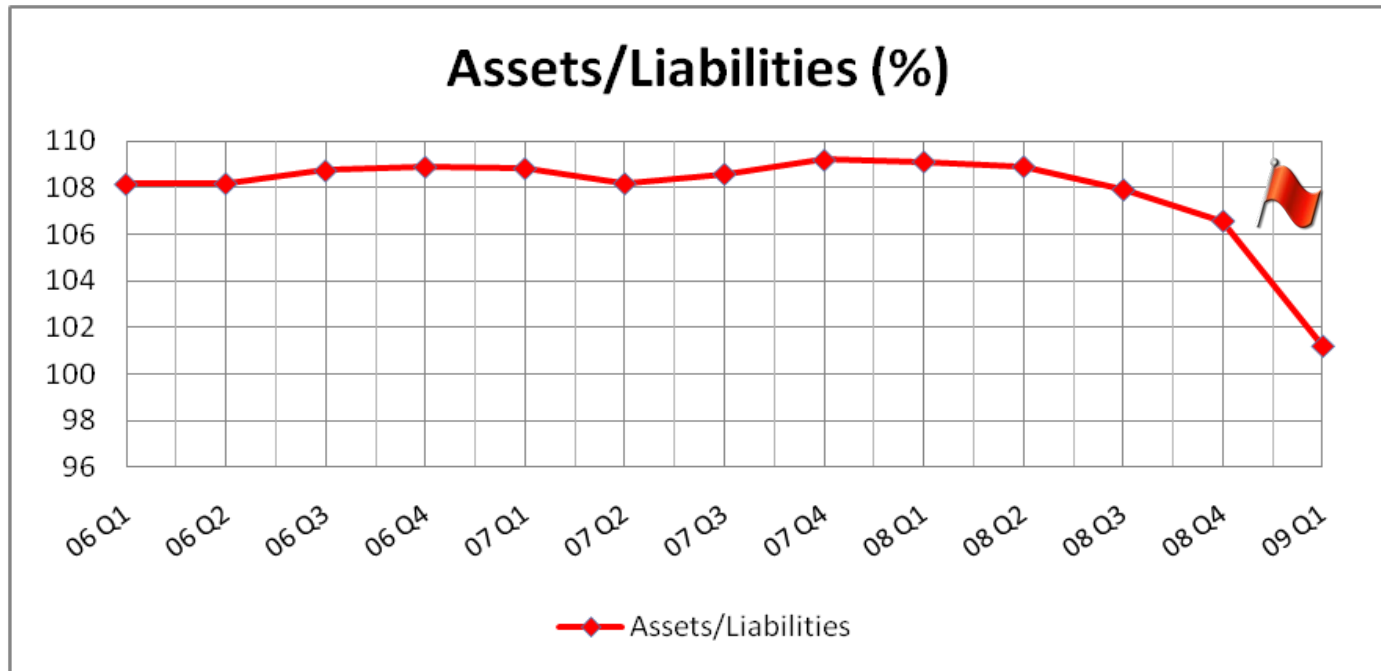


- The difference between asset and liability was getting closer in 08 Q4.



Indicates sign of bank in financial distress

Asset/Liability History

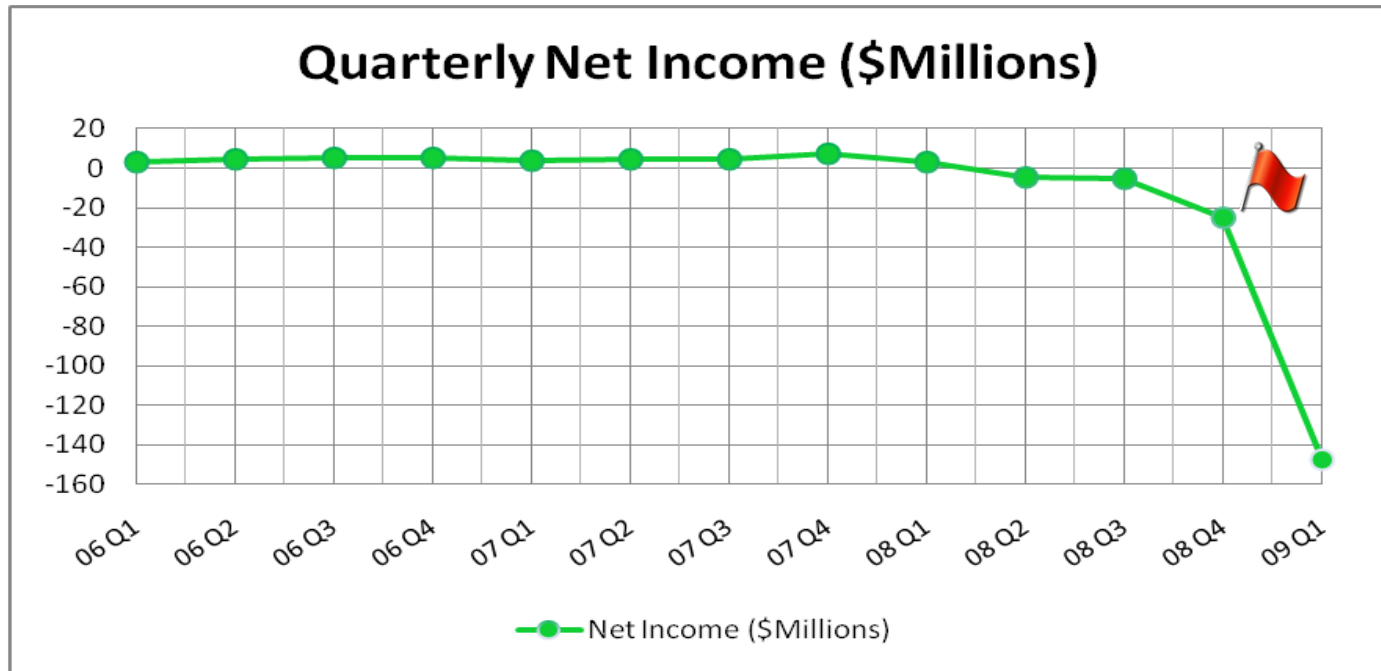


- The A/L ratio was decreasing since 08 Q1.



Indicates sign of bank in financial distress

Net Income History

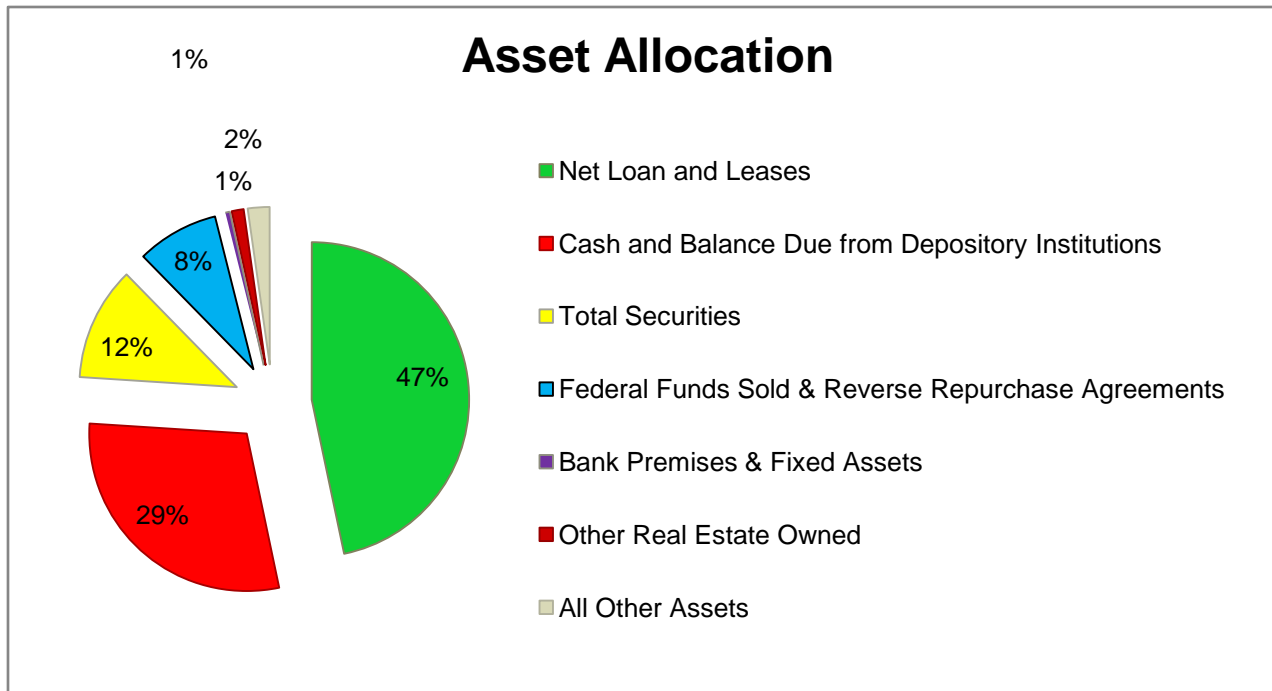


- The bank recorded a big loss in 09 Q1.
- The bank started reporting losses since 08 Q2.



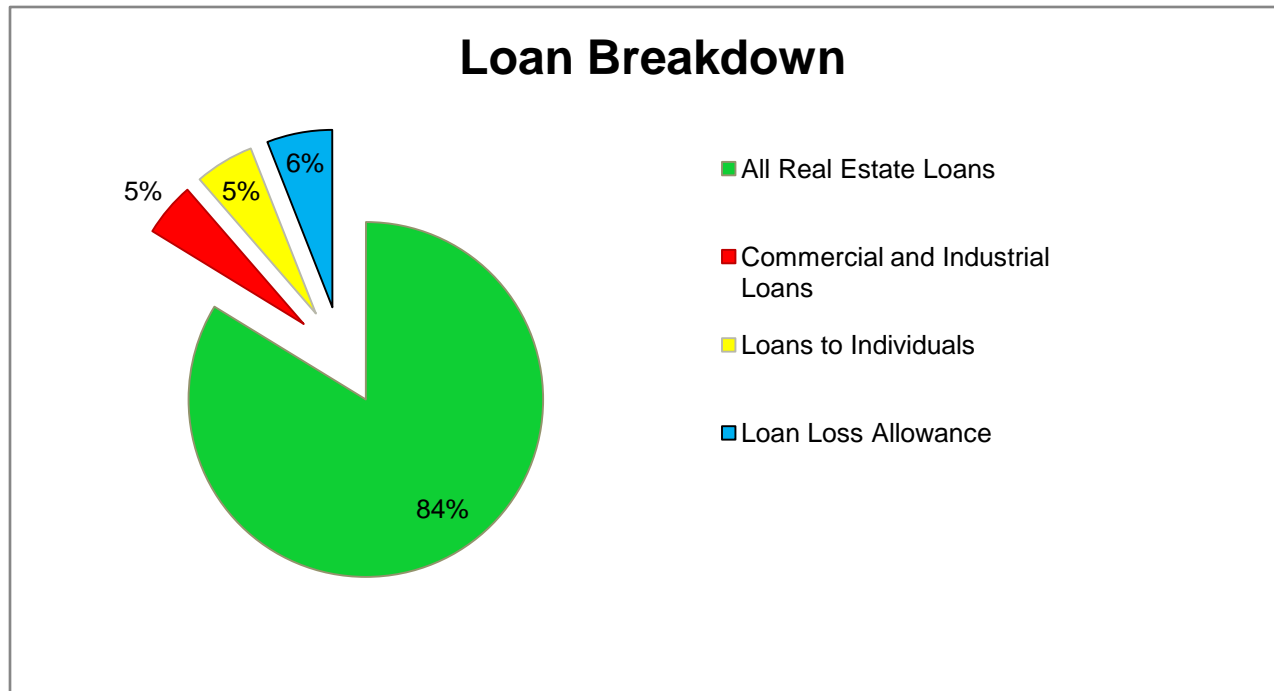
Indicates sign of bank in financial distress

Asset Allocation



- The average percentage of Net Loans for banks of the same Asset Concentration Hierarchy in the first quarter of 2009 was 71.42%.
- The average Net Loan percentage of all banks in the first quarter of 2009 was 64.89%.

Loan Breakdown



- The average percentage of Real Estate Loans for banks of the same Asset Concentration Hierarchy in the first quarter of 2009 was 76.90%.
- The average percentage for all banks in the first quarter of 2009 was 71.75%.

Events Timeline

Jan. 1, 08 - The Bankers Bank changed its name to Silverton Bank.

Feb. 20, 08 - Silverton ended the year 2007 with net income of \$18,301,000, an increase in earnings of 12.4% per share over 2006.

Mar. 08 - Silverton provided \$5 million line of credit to F&M Bank Corp.

Mar. 4, 08 - SEC voted to disclose information for the secondary market ETF investors in Form N-1A.

Mar. 7, 08 - The Fed will initiate a series of term repurchase transactions that are expected to cumulate to \$100 billion.

Mar. 19, 08 - Fannie Mae and Freddie Mac is expected to provide support to the U.S. mortgage market, up to \$200 billion immediate liquidity.

Apr. 3, 08 – Silverton announced the addition of two new veteran banking professionals to the senior management team.

May 29, 08 - U.S.-Canada mutual recognition arrangement: U.S. Securities markets and certain U.S. financial service firms could gain greater freedom to operate in Canada under SEC.

May 31, 08 - Sun American Bancorp drawn \$4.1 million against \$8 million secured line-of-credit with Silverton Bank.

June 10, 08 - FDIC releases a supervisory letter to all banks on interest reserves that examines the risks that this underwriting practice presents.

June 11, 08 - SEC voted on a comprehensive series of credit rating agency reforms to bring increased transparency to credit rating process.

Events Timeline

- June 17, 08** - New HOPE NOW guidelines to deal with issues surrounding second mortgages and short sales.
- June 26, 08** - FDIC adopts Basel II-Based Standardized Approach as an alternative risk-based capital framework available to all banks except the largest and most complex banks
- June 26, 08** - FRS, FDIC, and OCC issued the host state loan-to-deposit ratios, which help indicate branches outside of the home state that were established or acquired for the purpose of deposit production.
- Jul. 13, 08** - Paulson Announces a three-part plan for GSEs: a temporary increase in the line of credit, a temporary authority for Treasury to purchase equity, and an advisory role is given to the Fed.
- Aug. 20, 08** - FDIC's implementation in Loan Modification Program will help to modify troubled IndyMac mortgages loans.
- Sept. 17, 08** - SEC clarified that bank support of money market mutual funds generally are not required to present the fund on-balance sheet, but disclosure of the nature of the support provided is expected.
- Sept. 18, 08** - SEC requires that certain institutional money managers report their new short sales of certain publicly traded securities.
- Sept. 19, 08** - SEC prohibited short selling in 779 financial institutions.
- Sept. 20, 08** - Treasury Secretary Hank Paulson releases \$700 billion proposal to purchase troubled mortgage-related assets.
- Oct. 7, 08** - Emergency Economic Stabilization Act of 2008 Temporarily Increases Basic FDIC Insurance Coverage from \$100,000 to \$250,000 per Depositor.

Events Timeline

- Oct. 14, 08** - FDIC creates new program to guarantee bank debts and fully insure non-interest bearing deposit transaction accounts.
- Oct. 14, 08** - The Treasury Department will invest up to \$250 billion in the nation's banks via the Capital Purchase Program.
- Nov. 14, 08** - Sun American placed in default of its loan from Silverton Bank.
- Nov. 18, 08** - Minor said Silverton failed to make a \$1.1 million payment to finance a construction project.
- Nov. 20, 08** - FDIC announces the availability of IndyMac Loan Modification Model.
- Nov. 25, 08** - Created the Term Asset-Backed Securities Loan Facility to support the issuance of asset-backed securities collateralized by loans.
- Dec. 3, 08** - SEC approved measures to strengthen oversight of credit rating agencies.
- Dec. 16, 08** - Troubled banks have to provide certain position level and counterparty level data and QFC counterparty and portfolio identifiers to FDIC in a timely manner.
- Dec. 23, 08** - Treasury provides TARP funds to focal Banks by purchasing \$2.8 billion investment from 49 banks.
- Dec. 30, 08** - The Fed announced that it will purchase mortgage-backed securities.
- Jan. 15, 09** - The Senate voted to allow access to the remaining bailout funds of \$350 billion.
- Jan. 27, 09** - As part of the Capital Purchase Program, Treasury announced investments of \$386 million in 23 healthy banks.
- Feb. 10, 09** - Geithner rolls out the Financial Stability Plan, promises to perform "stress tests" on big banks, and commit \$100 billion to boost the TALF.

Events Timeline

- Feb. 10, 09** - A Capital Assistance Program to help ensure banks hold sufficient capital, produce a more consistent and forward-looking assessment of risks on banks' balance and their potential capital needs.
- Feb. 10, 09** - A Public-Private Investment Fund will combine public and private capital with government financing to help free up capital to support new lending.
- Feb. 10, 09** - Treasury and Fed expanded the Term Asset-Backed Securities Lending facility up to \$1 trillion.
- Feb. 18, 09** - President Obama signs the American Recovery and Reinvestment Act of 2009, which limits bonuses of the highest earning executives.
- Mar. 4, 09** - Treasury announced loan modification guidelines under the Administration's Homeowner Affordability and Stability Plan.
- Mar. 23, 09** - Using TARP capital and capital from private investors, the Public-Private Investment Program will generate \$500 billion in purchasing power to buy legacy assets.
- May 1, 09** – *Silverton Bank was closed by the Office of the Comptroller of the Currency. The FDIC created bridge bank to take over operations of Silverton Bank.*
- May 29, 09** - FDIC tightens the deposit interest rates paid by banks that are less than well capitalized. Generally, such banks will be permitted to offer to "national rate" plus 75 basis points.
- June 9, 09** -10 Of the largest U.S financial institutions are expected to make CPP repayments to Treasury.
- Jul. 2, 09** - FDIC proposed guidelines require private equity firms to hold bank purchases for 3yrs and maintain capital levels.

Report Summary – *Surprise?*

Based on the methods with which we analyzed, Silverton Bank, its failure was **not a surprise**.

Although Silverton Bank's delinquent asset and real estate loan asset analysis was relatively typical of banks with the same asset concentration hierarchy, there are other indications that Silverton Bank should fail:

- 1) **In the first quarter of 2009, Silverton Bank's normalized income was -3.52%, which was the worst performance since 2007.**
- 2) **Silverton Bank's asset: liability ratio has always been poor or very poor. One quarter prior to the bank's failure, Silverton Bank's asset: liability ratio dropped to 101.2%.**
- 3) **Its Bankability Composite Score was -9.23 before its failure, which was considered to be very poor.**

The combination of these three measures being very poor shows that the bank could fail anytime.

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