

Madam Speaker, I ask my colleagues to join me in honoring the life and service of Chief David Huerta. Chief Huerta was a selfless man who put others before himself throughout his career. His contributions to the Central Valley will be felt for many years to come. I join his family in honoring his great life.

RECOGNIZING TAIWAN'S NATIONAL DAY

HON. DON BACON

OF NEBRASKA

IN THE HOUSE OF REPRESENTATIVES

Thursday, September 26, 2019

Mr. BACON. Madam Speaker, I rise today to wish both the people of Taiwan and Americans celebrating the upcoming Taiwan's National Day on October 10th a Happy Double Ten Day.

In the decades preceding and following the Taiwan Relations Act of 1979, the United States and Taiwan have built a solid bond that cannot be broken—born out of our shared values and our cooperation with each other in times of crisis, and in times of advancement.

During the years, this key ally in the Indo-Pacific has transformed itself into a model of democracy that respects human rights, freedom of speech, rule of law, and market economy. Americans share these values, which is why we have also contributed to Taiwan's success.

In 2018, Taiwan was the 11th largest trading partner for the United States overall, and it is my home state Nebraska's 10th largest export market in the world. Our companies have substantial opportunities to expand their business and cooperation with Taiwan. I will, together with Taiwanese friends, work to find areas where we can partner to our mutual benefit.

This is a day to celebrate, and to be optimistic. I ask my colleagues to join me in recommitting ourselves to the robust U.S.-Taiwan relationship, and in wishing Taiwan a Happy Double Ten Day.

RECOGNIZING TIM CHAMBERS FOR HIS UNWAVERING DEDICATION TO THE UNITED STATES OF AMERICA

HON. TROY BALDERSON

OF OHIO

IN THE HOUSE OF REPRESENTATIVES

Thursday, September 26, 2019

Mr. BALDERSON. Madam Speaker, I rise today to recognize and honor the unwavering dedication of retired Marine Staff Sergeant, Tim Chambers.

First spotted in 2002, Tim Chambers—better known as “The Saluting Marine”—stood at attention for hours as thousands of motorcyclists rode past during the Rolling Thunder “Ride for Freedom” event in Washington, D.C. Since then, Tim has not missed a Rolling Thunder event. His single salute in 2002 set an example that has since rippled throughout the nation, raising awareness for missing-in-action servicemembers and prisoners of war.

Year after year, Tim continues to give veterans the welcome home they deserve yet did not receive upon returning home from war.

Standing for hours on end in, Tim overcomes physical conditions that would otherwise render him immobile, purely to honor the men and women who made the ultimate sacrifice for our country.

A modern-day hero, Tim selflessly rushed into the Pentagon after the crash of American Airlines Flight 77 during the 9/11 terrorist attacks, without knowing what lay ahead for him, the victims, and our country. Tim stayed three days in the attacks’ aftermath to continue rescue operations of his fellow Americans. Even in the most harrowing of times, Tim’s love of and dedication to country, along with his profound bravery, has always overcome the most colossal challenges.

A former Marine, Tim now acts as a veterans’ rights advocate, ensuring that the men and women who serve our country receive the respect, honor, remembrance, and thanks they deserve.

As I attend the Rolling Thunder event this coming weekend in Columbus, I will think of Tim’s honorable dedication to his country and fellow veterans, and all the American servicemembers who may never get their due welcome home. Tim Chamber’s devotion to our Armed Forces is felt throughout our nation, and I am humbled to honor him, returning to him the recognition and glory he has shown for his fellow American heroes.

SECURE AND FAIR ENFORCEMENT BANKING ACT OF 2019

SPEECH OF

HON. ED PERLMUTTER

OF COLORADO

IN THE HOUSE OF REPRESENTATIVES

Wednesday, September 25, 2019

Mr. PERLMUTTER. Madam Speaker, I include in the RECORD the following letters of endorsement for H.R. 1595, the SAFE Banking Act.

NATIONAL ASSOCIATION  
OF ATTORNEYS GENERAL,  
Washington, DC, May 8, 2019.

Hon. NANCY PELOSI,  
Speaker of the House,  
Washington, DC.

Hon. MITCH MCCONNELL,  
Majority Leader,  
Washington, DC.

Hon. STENY HOYER,  
Majority Leader,  
Washington, DC.

Hon. JAMES E. CLYBURN,  
Majority Whip,  
Washington, DC.

Hon. MIKE CRapo,  
Chair, Senate Committee on Banking, Housing  
& Urban Affairs, Washington, DC.

Hon. KEVIN McCARTHY,  
Minority Leader,  
Washington, DC.

Hon. CHARLES E. SCHUMER,  
Minority Leader,  
Washington, DC.

Hon. STEVE SCALISE,  
Minority Whip,  
Washington, DC.

Hon. RICHARD J. DURBIN,  
Minority Whip,  
Washington, DC.

Hon. SHERROD BROWN,  
Ranking Member, Senate Committee on Banking,  
Housing & Urban Affairs, Washington,  
DC.

DEAR CONGRESSIONAL LEADERS: We are a bipartisan group of state and territorial at-

torneys general who recognize that the states, territories and federal government share a strong interest in protecting public safety and bringing grey market financial activities into the regulated banking sector. To address these goals, we urge Congress to advance legislation that would allow states and territories that have legalized certain use of marijuana to bring that commerce into the banking system.

This issue is of broad relevance: for example, thirty-three states and several U.S. territories have legalized the medical use of marijuana. However, because the federal government classifies marijuana as an illegal substance, banks providing services to state-licensed cannabis businesses and even to other companies which sell services and products to those businesses could find themselves subject to criminal and civil liability under the federal Controlled Substances Act and certain federal banking statutes. This risk has significantly inhibited the ability of financial institutions to provide services to these businesses and companies.

Despite the contradictions between federal and state law, the marijuana industry continues to grow rapidly. Industry analysts estimate 2017 sales at \$8.3 billion and expect those totals to exceed \$25 billion by 2025. Yet those revenues are handled outside of the regulated banking system. Businesses are forced to operate on a cash basis. The resulting grey market makes it more difficult to track revenues for taxation and regulatory compliance purposes, contributes to a public safety threat as cash-intensive businesses are often targets for criminal activity, and prevents proper tracking of billions in finances across the nation. Importantly, this measure in no way constitutes an endorsement of any state or territory’s specific approach to the legalization of marijuana-related transactions, and the Act is in no way an endorsement for the legalization of medical or retail marijuana in those jurisdictions that choose not to pursue such an approach. But regardless of how individual policymakers feel about states permitting the use of medical or recreational marijuana, the reality of the situation requires federal rules that permit a sensible banking regime for legal businesses.

To address these challenges, we request that Congress advance the SAFE Banking Act or similar legislation that would provide a safe harbor for depository institutions that provide a financial product or service to a covered business in a state that has implemented laws and regulations that ensure accountability in the marijuana industry. An effective safe harbor would bring billions of dollars into the banking sector, enabling law enforcement; federal, state and local tax agencies; and cannabis regulators in 33 states and several territories to more effectively monitor cannabis businesses and their transactions. Compliance with tax laws and requirements would be simpler and easier to enforce with the regulated tracking of funds in the banking system, resulting in higher tax revenues.

Our banking system must be flexible enough to address the needs of businesses in the various states and territories, with state and territorial input, while protecting the interests of the federal government. This includes a banking system for marijuana-related businesses that is both responsive and effective in meeting the demands of our economy. We look forward to working with

you as Congress moves forward in this process and to lending our voice and expertise as you develop legislation.

Respectfully,

Phil Weiser, Colorado Attorney General; Karl A. Racine, District of Columbia Attorney General; Aaron D. Ford, Nevada Attorney General; Wayne Stenehjem, North Dakota Attorney General.

Kevin G. Clarkson, Alaska Attorney General; Mark Brnovich, Arizona Attorney General; Leslie Rutledge, Arkansas Attorney General; Xavier Becerra, California Attorney General; William Tong, Connecticut Attorney General; Kathleen Jennings, Delaware Attorney General; Leevin Taitano Camacho, Guam Attorney General; Clare E. Connors, Hawaii Attorney General; Kwame Raoul, Illinois Attorney General; Tom Miller, Iowa Attorney General; Andy Beshear, Kentucky Attorney General; Aaron M. Frey, Maine Attorney General; Brian Frosh, Maryland Attorney General; Maura Healey, Massachusetts Attorney General; Dana Nessel, Michigan Attorney General; Keith Ellison, Minnesota Attorney General; Jim Hood, Mississippi Attorney General; Gurbir S. Grewal, New Jersey Attorney General.

Hector Balderas, New Mexico Attorney General; Letitia James, New York Attorney General; Edward Manibusan, Northern Mariana Islands Attorney General; Dave Yost, Ohio Attorney General; Mike Hunter, Oklahoma Attorney General; Ellen F. Rosenblum, Oregon Attorney General; Josh Shapiro, Pennsylvania Attorney General; Wanda Vazquez Garced, Puerto Rico Attorney General; Peter Neronha, Rhode Island Attorney General; Sean Reyes, Utah Attorney General; T.J. Donovan, Vermont Attorney General; Denise N. George, U.S. Virgin Islands Attorney General; Mark R. Herring, Virginia Attorney General; Robert W. Ferguson, Washington Attorney General; Patrick Morrisey, West Virginia Attorney General; Joshua L. Kaul, Wisconsin Attorney General.

On behalf of the 1.3 million members of the United Food and Commercial Workers International Union (UFCW), including thousands of cannabis workers, we urge you to vote “yes” on the Secure and Fair Enforcement Banking Act of 2019 when it comes to the House floor.

UFCW’s cannabis members can be found in growing and cultivating facilities; manufacturing and processing facilities; and in laboratories and dispensaries in multiple states.

The current ban on banking access for cannabis related businesses has led to confusion and uncertainty for cannabis workers who are just trying to do their jobs and support their families. The lack of uniform treatment of cannabis by federal, state and local laws has resulted in workers being denied personal loans for homes and cars, even when they have high credit scores. Hardworking Americans in the cannabis industry should not have to struggle with financial and legal ambiguity while on the job.

Since cannabis employers must pay their workers in cash, they are also vulnerable to violent crime both inside and outside their place of business. When employers gain access to conventional banking, their workers gain both economic and personal security.

A majority of states have some form of legal cannabis and it is imperative that the federal government update our nation’s banking laws to include this new and growing industry.

As the nation’s largest union of cannabis workers, we urge Congress to pass the SAFE Banking Act and give cannabis workers access to the same financial systems that all other American workers enjoy.

ADEMOLA OYEFESO,  
International Vice  
President, Director,

UFCW Legislative &  
Political Action De-  
partment.

AMERICAN BANKERS ASSOCIATION,  
September 24, 2019.

Hon. NANCY PELOSI,  
Speaker, House of Representatives,  
Washington, DC.  
Hon. KEVIN McCARTHY,  
Minority Leader, House of Representatives,  
Washington, DC.

DEAR SPEAKER PELOSI AND MINORITY LEADER McCARTHY: The American Bankers Association (ABA) is pleased to express our support for H.R. 1595, the Secure and Fair Enforcement Banking Act (SAFE Banking Act) of 2019, which is scheduled for consideration before the House of Representatives in the coming days.

Currently, 33 states covering 68 percent of the nation’s population have legalized cannabis for medical or adult-use and at least seven additional states are expected to consider ballot initiatives in the next two years. Despite that, current federal law prevents financial institutions from banking cannabis businesses, as well as the ancillary businesses that provide them with goods and services. As a result, a majority of states are struggling to address the significant challenges to public safety, as well as regulatory compliance and tax compliance that go hand-in-hand with cash-reliant businesses. Although we do not take a position on the legalization of marijuana, our members are committed to serving the financial needs of their communities—including those that have voted to legalize cannabis.

H.R. 1595, sponsored by Representatives ED PERLMUTTER (D-CO), DENNY HECK (D-WA), STEVE STIVERS (R-OH) and WARREN DAVIDSON (R-OH), along with over 200 members of the House, takes an important step toward enabling financial services for cannabis-related businesses.

The bill specifies that proceeds from a legitimate cannabis business would not be considered unlawful under federal money laundering statutes or any other federal law, which is necessary to allow financial services to cannabis businesses and any ancillary businesses that derive some portion of their income from cannabis businesses. The bill would also direct the Financial Crimes Enforcement Network (FinCEN) and the federal banking regulators, through the Federal Financial Institutions Examination Council, to issue guidance and exam procedures for banks doing business with cannabis related legitimate businesses. We believe such explicit, consistent direction from federal financial regulators will provide needed clarity for banks and help them to better evaluate the risks and supervisory expectations for cannabis-related customers.

As the legal state-cannabis industry continues to grow, the indirect connections to cannabis revenues—from real estate owners, security firms, utilities, law firms and employees of cannabis businesses, as well as investors—will also continue to expand. Without greater clarity, that entire portion of economic activity in legal cannabis states—estimated by some to be in the tens of billions of dollars—will continue to be marginalized from the banking system.

Providing a mechanism for the cannabis industry to access the banking system would help those communities reduce cash-motivated crimes, increase the efficiency of tax collections, and improve the financial transparency of the cannabis industry. It would also subject cannabis businesses to increased oversight of their financial activities since bank accounts are monitored in accordance with existing anti-money laundering and Bank Secrecy Act requirements which help

law enforcement identify suspicious transactions—an opportunity that is not available in an all-cash environment.

The SAFE Banking Act, as amended, is an important measure that helps clarify many issues for the banking industry, regulators, businesses and consumers. It also provides immediate relief for urgent public safety and cannabis industry oversight challenges, which will help keep our communities safe and should not be delayed while Congress works to build consensus on broader questions of national drug policy. ABA urges members of the House to support H.R. 1595.

Sincerely,

ROB NICHOLS,  
President and CEO.

SEPTEMBER 19, 2019.

Hon. NANCY PELOSI,  
Speaker, House of Representatives,  
Washington, DC.  
Hon. KEVIN McCARTHY,  
Minority Leader, House of Representatives,  
Washington, DC.

DEAR SPEAKER PELOSI AND MINORITY LEADER McCARTHY: On behalf of the undersigned state bankers associations, representing banks throughout the country, we write to express our support for H.R. 1595, the Secure and Fair Enforcement (SAFE) Banking Act of 2019, which will soon be considered before the House of Representatives.

Since 1996, 33 states comprising 68 percent of the nation’s population have legalized cannabis for medical or adult use, and that number is only expected to grow. Despite this ever-growing voter preference, current Federal law continues to prevent banks from offering products and services to these businesses without fear of federal sanctions. Inevitably, leaving the cannabis industry unbanked presents serious public safety, revenue administration, and legal compliance concerns and must be remedied immediately.

As a result of the federal prohibition and lack of regulatory clarity, legal cannabis businesses must operate on an all-cash basis, subjecting their employees and the general public to serious risk of criminal activity and harm. These businesses also must remit payments for state taxes and licensing fees in cash, denying the states the efficiencies and safety of more modern payment methods. This in turn significantly increases state compliance auditing costs, since operating on an all-cash basis leaves no paper trails for auditors to follow.

The impact on local economies is also significant. As the cannabis industry continues to grow in states where it is legal, unrelated businesses that provide products and services to the industry also become ensnared in the problem. Because revenue paid to them by cannabis businesses can be considered monies derived from illegal activities, and financial institutions that bank the unrelated businesses can be accused of violating anti-money laundering laws. If banks are forced to discontinue relationships with these unrelated businesses, a significant portion of the economy in states where cannabis is legal will be cut off from the regulated banking system.

Although we do not take a position on the legalization of marijuana, our members are committed to serving the financial needs of their communities—including those that have voted to legalize cannabis. That is why we support H.R. 1595. This is fair and balanced legislation that will permit depository institutions to serve the needs of their customers in states where cannabis is legal. The bill provides a mechanism for the cannabis industry and its service providers to deposit their cash in regulated financial institutions, which allows banks to meet the needs

of their communities and helps those communities reduce cash-motivated crimes, increase the efficiency of tax collections, and improve the financial transparency of the cannabis industry.

We urge you to support H.R. 1595 when this legislation comes before the House.

Sincerely,

Alabama Bankers Association, Alaska Bankers Association, Arizona Bankers Association, Arkansas Bankers Association, California Bankers Association, Colorado Bankers Association, Connecticut Bankers Association, Delaware Bankers Association, Florida Bankers Association, Georgia Bankers Association.

Hawaii Bankers Association, Idaho Bankers Association, Illinois Bankers Association, Indiana Bankers Association, Iowa Bankers Association, Kansas Bankers Association, Louisiana Bankers Association, Maine Bankers Association, Maryland Bankers Association, Massachusetts Bankers Association.

Michigan Bankers Association, Minnesota Bankers Association, Mississippi Bankers Association, Missouri Bankers Association, Montana Bankers Association, Nebraska Bankers Association, Nevada Bankers Association, New Hampshire Bankers Association, New Jersey Bankers Association, New Mexico Bankers Association.

New York Bankers Association, North Carolina Bankers Association, North Dakota Bankers Association, Ohio Bankers League, Oklahoma Bankers Association, Oregon Bankers Association, Pennsylvania Bankers Association, Puerto Rico Bankers Association, Rhode Island Bankers Association, South Carolina Bankers Association.

South Dakota Bankers Association, Tennessee Bankers Association, Texas Bankers Association, Utah Bankers Association, Vermont Bankers Association, Virginia Bankers Association, Washington Bankers Association, West Virginia Bankers Association, Wisconsin Bankers Association, Wyoming Bankers Association.

SEPTEMBER 19, 2019.

Hon. NANCY PELOSI,  
*Speaker of the House, House of Representatives, Washington, DC.*

Hon. KEVIN McCARTHY,  
*Minority Leader, House of Representatives, Washington, DC.*

DEAR SPEAKER PELOSI AND MINORITY LEADER McCARTHY: On behalf of our members, we write to express our support for H.R. 1595, the Secure and Fair Enforcement (SAFE) Banking Act of 2019 which is scheduled for consideration before the House of Representatives in the near future.

This important bipartisan legislation, introduced by Representatives Ed Perlmutter (D-CO), Steve Stivers (R-OH), Denny Heck (D-WA) and Warren Davidson (R-OH) and supported by over 200 cosponsors would permit depository institutions to serve the needs of their customers in states where cannabis is legal.

The House Financial Services Committee has held substantive hearings on H.R. 1595 and worked cooperatively to solve the practical problems caused by the disparate treatment of cannabis under federal and state laws. Although we do not take a position on the legalization of marijuana, our members are committed to serving the financial needs of their communities—including those that have voted to legalize cannabis. The current threat of criminal and civil liability under federal law is suppressing the provision of vital financial services in the thirty-three states that have legalized cannabis in some form.

The SAFE Banking Act of 2019 provides a mechanism for the cannabis industry and its

service providers to deposit their cash in regulated financial institutions, which allows our members to meet the needs of their communities and helps those communities reduce cash-motivated crimes, increase the efficiency of tax collections, and improve the financial transparency of the cannabis industry.

Without congressional action, a significant portion of economic activity, including those businesses with only indirect connections to the cannabis industry, such as vendors, suppliers, and utility companies, risk being marginalized from the financial system in states with legal cannabis industries. H.R. 1595 provides needed legal protection and clarity for financial institutions to accept deposits, extend credit, and provide other financial services to individuals and businesses that derive some portion of their income from legal state cannabis related activity.

We urge members of the House to support H.R. 1595.

Sincerely,

American Bankers Association (ABA), Credit Union National Association (CUNA), Independent Community Bankers of America (ICBA), National Bankers Association (NBA).

M B C A, MID-SIZE BANK COALITION OF AMERICA,

September 23, 2019.

Hon. NANCY PELOSI,  
*Speaker of the House, Washington, DC.*

Hon. STENY H. HOYER,  
*House Majority Leader, Washington, DC.*

Hon. JAMES E. CLYBURN,  
*House Majority Whip, Washington, DC.*

Hon. KEVIN McCARTHY,  
*House Minority Leader, Washington, DC.*

Hon. STEVE J. SCALISE,  
*House Minority Leader, Washington, DC.*

SPEAKER PELOSI, MAJORITY LEADER HOYER, MAJORITY WHIP CLYBURN, MINORITY LEADER McCARTHY, AND MINORITY WHIP SCALISE: The Mid-Size Bank Coalition of America (MBCA) is writing to urge House consideration of Secure and Fair Enforcement (SAFE) Banking Act of 2019, which would allow the provision of banking services to cannabis-related businesses (CRBs) through a federal safe harbor. We deeply appreciate the House Financial Services Committee's bipartisan passage of the bill in March, and look forward to the full House passing it as well.

The conflict between federal and states laws and the evolving legal and regulatory environment surrounding cannabis has put banks and CRBs in an untenable position. While the public policy question of whether cannabis should be legalized is outside the scope of the MBCA charter, it is greatly concerning that our member banks could find themselves the subject of regulatory enforcement actions as a result of extending services to legally licensed businesses directly involved in cannabis commerce, or even businesses that provide services to those cannabis businesses.

While a variety of attempts have been made to restrict federal enforcement of cannabis laws, including the Cole Memorandum and the Leahy and Joyce-Blumenauer amendments, the Director of the Financial Crimes Enforcement Network (FinCEN) has stated unequivocally that it is a federal crime to sell, manufacture or purchase marijuana (the terms used in the Controlled Substances Act of 1970). It is therefore prohibited under federal law to provide banking services to CRBs, which includes a wide range of ancillary businesses that have no di-

rect involvement in the sale, manufacture or purchase of marijuana. Even if banks attempt to avoid banking businesses that are involved directly in the cannabis industry, questions arise regarding businesses that may service those cannabis establishments. Is a payroll processor that provides services to a dispensary violating federal law, and therefore ineligible for banking services? Is a real estate developer who might have one property occupied by a dispensary or grower likewise in violation? Unfortunately, our member banks simply do not know what is allowed and what we are not allowed to do. These questions assume enormous importance due to the massive negative impact on banks resulting from potential Bank Secrecy Act (BSA) and anti-money laundering (AML) violations. We fear, however, that due to the complicated legal and regulatory environment, violations could occur that result in significant reputational, economic and legal damage despite our bankers' best efforts to avoid violating federal laws and regulations.

As of today, thirty-three states and the District of Columbia have legalized cannabis for medical and/or adult use, and, as such, this is now a national issue that requires a federal solution. It is clear that only Congress can take effective action to resolve these issues, and while the SAFE Banking Act is not a perfect solution to the problem of a federal-state conflict in this area, the MBCA supports the SAFE Banking Act as an important step forward, and we urge the House to consider it.

The Mid-Size Bank Coalition of America appreciates your attention to this critical matter. If you have any questions about this letter or any additional information would be helpful, please contact Brent Tjarks, the MBCA's Executive Director.

Sincerely,  
ALESSANDRO DINELLO,  
*Chairman,*  
*Mid-Size Bank Coalition of America.*

MID-SIZE BANK COALITION OF AMERICA  
MEMBERS

1. Ameris Bank (Moultrie, GA)
2. Apple Bank (New York, NY)
3. Arvest Bank (Fayetteville, AR)
4. Associated Bank (Green Bay, WI)
5. BancorpSouth (Tupelo, MS)
6. BannerBank (Walla Walla, WA)
7. BankUnited (Miami Lakes, FL)
8. Banc of California (Santa Ana, CA)
9. Bank of Hope (Los Angeles, CA)
10. Bank Leumi USA (New York, NY)
11. Bank of Hawaii (Honolulu, HI)
12. Bank of the Ozarks (Little Rock, AR)
13. Berkshire Bank (Pittsfield, MA)
14. BOK Financial (Tulsa, OK)
15. Bremer Bank (Saint Paul, MN)
16. Busey Bank (Champaign, IL)
17. Cadence Bank (Houston, TX)
18. Cathay Bank (Los Angeles, CA)
19. Cenlar FSB (Ewing, NJ)
20. Centennial Bank (Conway, AR)
21. CenterState Bank (Winter Haven, FL)
22. Central Bancompany (Jefferson City, MO)
23. Chemical Bank (Midland, MI)
24. CIT Bank (Pasadena, CA)
25. CIBC U.S. (Chicago, IL)
26. City National Bank (Los Angeles, CA)
27. Columbia Bank (Tacoma, WA)
28. Commerce Bank (Kansas City, MO)
29. Community Bank (De Witt, NY)
30. Cullen/Frost Bankers (San Antonio, TX)
31. Customers Bank (Phoenixville, PA)
32. Dollar Bank (Pittsburgh, PA)
33. EagleBank (Bethesda, MD)
34. Eastern Bank (Boston, MA)
35. East West Bank (Pasadena, CA)
36. F.N.B. Corporation (Pittsburgh, PA)
37. FirstBank Holding Company (Lakewood, CO)

38. First Citizens Bank (Raleigh, NC)  
39. First Financial Bank (Cincinnati, OH)  
40. First Financial Bankshares (Abilene, TX)  
41. First Hawaiian Bank (Honolulu, HI)  
42. First Horizon Bank (Memphis, TN)  
43. First Interstate Bank (Billings, MT)  
44. First Merchants Bank (Muncie, IN)  
45. First Midwest Bank (Itasca, IL)  
46. First National Bank of Omaha (Omaha, NE)  
47. Flagstar Bank (Troy, MI)  
48. Fulton Financial (Lancaster, PA)  
49. Glacier Bank (Kalispell, MT)  
50. Great Western Bank (Sioux Falls, SD)  
51. Hancock Whitney (Gulfport, MS)  
52. Heartland Financial (Dubuque, IA)  
53. Hilltop Holdings (Dallas, TX)  
54. Independent Bank (McKinney TX)  
55. International Bancshares (Laredo, TX)  
56. Investors Bank (Short Hills, NJ)  
57. IBERIABANK (Lafayette, LA)  
58. Mechanics Bank (Richmond, CA)  
59. MidFirst Bank (Oklahoma City, OK)  
60. NBT Bank (Norwich, NY)  
61. Northwest Bank (Warren, PA)  
62. Old National Bank (Evansville, IN)  
63. Opus Bank (Irvine, CA)  
64. Pacific Premier Bank (Irvine, CA)  
65. PacWest Bank (Beverly Hills, CA)  
66. People's United Bank (Bridgeport, CT)  
67. Pinnacle Bank (Lincoln, NE)  
68. Pinnacle Financial Partners (Nashville, TN)  
69. Popular Community Bank (New York, NY)  
70. Provident Bank (Iselin, NJ)  
71. Raymond James Bank (Saint Petersburg, FL)  
72. Renasant Bank (Tupelo, MS)  
73. Rockland Trust (Rockland, MA)  
74. Sandy Spring Bank (Olney, MD)  
75. Seacoast Bank (Palm Beach, FL)  
76. ServisFirst Bank (Birmingham, AL)  
77. Signature Bank (New York, NY)  
78. Silicon Valley Bank (Santa Clara, CA)  
79. Simmons Bank (Pine Bluff, AR)  
80. South State Bank (Columbia, SC)  
81. Sterling National Bank (Montebello, NY)  
82. Stifel Bank & Trust (Saint Louis, MO)  
83. Synovus Bank (Columbus, GA)  
84. TCF Bank (Sioux Falls, SD)  
85. Texas Capital Bank (Dallas, TX)  
86. Third Federal Savings (Cleveland, OH)  
87. TIAA Bank (Jacksonville, FL)  
88. TowneBank (Portsmouth, VA)  
89. Trustmark (Jackson, MS)  
90. UMB Financial (Kansas City, MO)  
91. Umpqua Bank (Roseburg, OR)  
92. Union Bankshares (Richmond, VA)  
93. United Community Bank (Blairsville, GA)  
94. United Bankshares (Charleston, WV)  
95. Valley (Wayne, NJ)  
96. Washington Federal Bank, N.A. (Seattle, WA)  
97. Webster Bank (Waterbury, CT)  
98. WesBanco Bank (Wheeling, WV)  
99. Western Alliance Bank (Phoenix, AZ)  
100. Wintrust Financial (Rosemont, IL)