

# FINREG Focus

## U.S. Financial Services Regulatory Center Update

June 15, 2026

### Executive Summary

#### This update's headline items:

1. FDIC signals major reset in resolution readiness, assessments, and failure execution.
2. Consumer Financial Protection Bureau (CFPB) clarifies ability-to-repay expectations where immigration status affects repayment capacity.
3. Regulators set common data standards under the *Financial Data Transparency Act*.
4. National Credit Union Administration (NCUA) clarifies federal credit union authority over non-interest charges and fees.
5. Officer of the Comptroller of the Currency (OCC) proposes stablecoin reporting framework under the GENIUS Act.

### Overview of Key Developments

#### 1. Resolution Readiness

##### What Happened?

In a speech at the U.S. Chamber of Commerce, FDIC Chairman Travis Hill [outlined plans](#) for a broad overhaul of the agency's bank resolution framework. Central to the plans is a shift away from lengthy, narrative insured depository institution (IDI) resolution plans toward concise, operational data that can be accessed rapidly in case of a failure. He also previewed a new "resolution readiness adjustment" to the deposit insurance assessment framework, an incentive that would lower assessments for large banks that prove they can quickly provide the FDIC with access to critical data and systems in a failure scenario.

Beyond resolution planning changes, Hill discussed adjusting deposit insurance assessments across the industry: reducing rates, including a 2 basis-point cut for small banks, increasing and indexing the current \$10 billion asset threshold for the large-bank assessment category, and modernizing the large-bank risk scorecard. Hill noted the Deposit Insurance Fund's reserve ratio currently stands at 1.43% and said the agency expects to continue building toward the long-term target of 2%.

Additional reforms under active consideration include replacing certain Part 370 record-keeping requirements with a simpler approach, revisiting the qualified financial contract (QFC) rule to focus on data that can be produced quickly, and expanding bidder participation in failed-bank sales, e.g., pre-qualifying certain nonbanks. Hill also announced plans to modify the FDIC's procurement process for resolution-related contracts, noting that the current process excludes top firms and pledging to issue a solicitation to a broader set of financial advisors and firms in the coming weeks.

Hill called on Congress to consider a de minimis exception to the "least-cost" test that would allow more flexibility in protecting uninsured depositors under narrow circumstances. The FDIC is also working with the Federal Financing Bank to create a permanent facility for rapidly monetizing receivership assets, a structural reform informed by liquidity challenges experienced during the 2023 bank failures.

### Why Does It Matter?

Hill's speech reflects a pivot toward execution-focused resolution preparedness, informed by challenges observed in recent bank failures where data access, speed, and operational readiness were critical constraints. Emphasizing operational data and offering assessment discounts for resolvability investments signals a shift toward more market-based discipline, effectively rewarding banks that invest in their own resolution readiness.

At the same time, potential relief from rules like Part 370 and the QFC requirements could reduce compliance costs for large institutions. The planned overhaul of the FDIC's resolution contracting process may open new opportunities for firms that have been excluded by the agency's procurement framework.

Finally, if Congress provides an exception to the least-cost mandate, it will give regulators more flexibility in a future crisis and potentially reshape depositor outcomes and the perception of fairness across institutions.

### The Bottom Line:

The FDIC is moving to streamline resolution planning, lower industry costs, and improve the execution of bank failures. For banks, the focus is shifting from static plan documents to genuine operational readiness, with tangible financial and regulatory incentives now tied to how quickly and smoothly they can facilitate an orderly resolution.

## 2. CFPB Statement on ATR Considerations

### What Happened?

The CFPB [issued a formal statement](#) reminding creditors of their obligations under the *Truth in Lending Act's* (TILA) ability-to-repay (ATR) requirements. Specifically, the statement focuses on how a borrower's immigration status can, and in some instances must, factor into ATR determinations for mortgages and credit card accounts.

The CFPB notes that creditors are permitted, and in certain instances are obligated, to consider a borrower's immigration status when assessing a borrower's ability to repay if immigration status could affect a borrower's future income or employment continuity. The statement includes specific indicators that may warrant attention, including the use of an individual taxpayer identification number (ITIN) or other atypical identification methods. The CFPB explicitly cites Regulation B as historically allowing lenders to consider an applicant's immigration status in underwriting. The statement is issued as guidance and does not have the force or effect of law but signals how the CFPB interprets existing ATR rules.

### Why Does It Matter?

The statement was issued in response to Executive Order 14406, "Restoring Integrity to America's Financial System," which directed the CFPB to clarify within 60 days that potential deportation and loss of wages are factors that could affect ATR determinations. Further, it follows the CFPB's January 2026 withdrawal of a 2023 joint CFPB-U.S. Department of Justice (DOJ) statement that cautioned lenders against considering immigration status in credit decisions.

### The Bottom Line:

The CFPB is signaling that ATR reviews should account for known factors that may affect a borrower's repayment capacity, including immigration-related considerations where relevant. Creditors should ensure their ATR policies appropriately address foreseeable changes in a borrower's circumstances, while continuing to apply case-by-case judgment consistent with Regulation B and TILA.

## 3. Common Data Standards

### What Happened?

Nine U.S. financial regulators, spanning banking, securities, derivatives, consumer finance, housing finance, and the U.S. Department of the Treasury, jointly finalized a [congressionally mandated rule](#) establishing common data standards for regulatory reporting. The final rule, required by the *Financial Data Transparency Act of 2022* (FDTA), defines uniform technical standards to make data submissions consistent across agencies.

It establishes seven identifiers and code conventions for key data fields, for example: adopting the global Legal Entity Identifier (ISO 17442) for reporting entities; Unique Product Identifier (ISO 4914) and Classification of Financial Instruments (ISO 10962) for derivatives and standardized product classification; geographic locations, dates (ISO 8601), and currencies (ISO 4217). The rule also includes principles for high-quality, machine-readable data transmission and schema formats. Notably, the final rule eliminates the proposed Financial Instrument Global Identifier as a common standard for identifying financial instruments, one of the most significant changes from the August 2024 proposal.

The joint rule is effective October 1, 2026. However, it does not immediately change any reporting forms or obligations. The OCC has explicitly noted that the joint data standards do not affect community banks at this stage. Each agency will determine how to incorporate the standards into its specific reporting requirements through separate agency-specific rulemakings within two years of the joint rule, *i.e.*, approximately late-2028.

### Why Does It Matter?

This rule is a milestone toward harmonized regulatory data. Today, different regulators often require similar information in different formats, burdening firms and hampering analysis. By introducing common data identifiers and format standards, the regulators aim to improve data quality, comparability, and cross-agency sharing while eventually reducing duplicative compliance effort. In the short term, nothing changes for financial institutions. As regulators implement the standards, firms will need to update their reporting systems and data processes to comply. Regulators have flexibility to tailor and phase in the standards, so adoption timing and approach may differ by regulator.

## The Bottom Line:

This joint rule is a blueprint rather than a final endpoint. It establishes the building blocks for standardized regulatory data but defers actual changes to later agency actions. However, the absence of a common financial instrument identifier and the broad tailoring authority granted to individual agencies reinforces the uncertainty around the final shape of the FDTA implementation. As such, companies should monitor upcoming agency-specific rules closely, as those will determine which standards become mandatory, when they take effect, and how much compliance effort is required.

## 4. FCU Interchange Authority

### What Happened?

The NCUA Board issued an [interim final rule](#), clarifying the authority of federal credit unions (FCUs) to charge non-interest charges and fees, including interchange fees on credit and debit card transactions. The rule explicitly confirms that FCUs may assess and receive these fees even when the amounts are set by third parties such as payment card networks.

The interim final rule explicitly preempts state laws that would limit or prohibit FCUs from charging such fees, most notably the Illinois *Interchange Fee Prohibition Act* (IFPA), which bans the collection of interchange fees on the tax and gratuity portions of credit and debit card transactions and restricts the use of payment card transaction data.

While the interim final rule is effective as June 30, 2026, the NCUA is accepting public comments on the matter through July 9, 2026.

### Why Does It Matter?

This regulatory action seeks to resolve legal uncertainty and asserts federal preemption to prevent conflicting state restrictions from impeding FCU operations. The action follows parallel steps taken by the OCC in April 2026, *i.e.*, Bulletins 2026-17 and 2026-18, which affirmed federal preemption of the Illinois IFPA for national banks and confirmed their authority to charge non-interest fees. The NCUA indicated it acted to clarify and avoid disparate treatment between FCUs and national banks.

The IFPA raised concerns that FCUs might have to alter fee practices, absorb revenue losses, or withdraw certain payment card services to comply with restrictions that do not apply to national bank competitors. The Illinois General Assembly has since delayed the IFPA's effective date to July 1, 2027, though the preemption question remains.

The interim rule, grounded in the *Federal Credit Union Act's* incidental powers and NCUA's exclusive oversight of FCU fees, asserts a uniform national framework: FCUs can continue collecting customary fees (including interchange) under federal law without state interference. This clarity is especially critical for small and midsize credit unions that rely on consistent fee income to support card programs and risk management efforts.

## The Bottom Line:

Effective June 30, 2026, the NCUA's interim final rule confirms that FCUs may assess and receive non-interest charges and fees under federal law. The rule provides near-term regulatory clarity from the NCUA and asserts federal preemption over state interchange fee restrictions. Comments are requested on the interim final rule through July 9, 2026.

## 5. OCC Stablecoin Reporting

### What Happened?

On June 11, 2026, the OCC issued [Bulletin 2026-24](#) requesting public comment on a new proposed information collection that would include weekly and quarterly reporting forms that must be completed by permitted payment stablecoin issuers and foreign payment stablecoin issuers registered with the OCC under the GENIUS Act. The proposed forms accompany the OCC's March 2, 2026 notice of proposed rulemaking, which establishes its broader regulatory framework for payment stablecoin activities.

The OCC released draft weekly and quarterly reporting forms, Forms PS-01 and PS-02, along with detailed instructions and Excel templates. Specifically, Form PS-01 would require weekly submissions with daily, coin-level data covering issuance and redemption activity, reserve asset composition, trading volumes, and concentration metrics, while Form PS-02 would require quarterly, issuer-level financial reporting, including income, balance sheet items, off-balance-sheet exposures, and capital and operational backstops. Both forms would be prepared in accordance with U.S. GAAP and submitted via OCC BankNet. Further, weekly reports would be confidential, while quarterly reports would generally be public, subject to approved confidentiality requests.

Comments are requested within 60 days of **Federal Register** publication.

### Why Does It Matter?

The proposal translates the GENIUS Act into supervisory expectations and brings stablecoin issuers closer to bank-style regulatory reporting. The frequency and granularity of the weekly reporting signal heightened scrutiny of liquidity, reserve quality, and concentration risk. Public quarterly reporting introduces market transparency and discipline by allowing stakeholders to evaluate the financial condition of stablecoin issuers.

### The Bottom Line:

Bulletin 2026-24 outlines proposed reporting mechanisms that would support future OCC supervision of permitted payment stablecoin issuers (PPSIs) and foreign issuers. While no immediate reporting is required, affected institutions should begin preparing by assessing their data capabilities, reserve management practices, and reporting controls, and considering whether to submit comments during the upcoming comment period.

The federal agencies face a July 18, 2026 deadline to finalize most required rulemakings to implement the GENIUS Act. With the deadline quickly approaching, the pace of finalization will be a key factor for institutions to monitor.

## Recent Key Regulatory Developments

### Joint Banking Agency

Date	Topic	Summary
6/08	<a href="#">Agencies Finalize Data Standards to Streamline Regulatory Reporting</a>	Regulators finalized joint data standards under the FDTA to standardize identifiers and data formats across agencies, aiming to improve interoperability, enhance data quality, and reduce duplicative reporting burdens on financial institutions.

### Federal Reserve Board

Date	Topic	Summary
6/11	<a href="#">Federal Reserve Releases Latest Financial Accounts of the United States (Z.1)</a>	Fed released its quarterly Z.1 Financial Accounts report providing detailed data on financial assets, liabilities, net worth, and funding flows across U.S. sectors, offering a comprehensive view of balance sheets and financial activity in the economy.

### Office of the Comptroller of the Currency

Date	Topic	Summary
6/11	<a href="#">OCC Seeks Comment on GENIUS Act Reporting Requirements for Stablecoin Issuers</a>	OCC issued Bulletin 2026-24 proposing new information collection processes that would include weekly and quarterly reporting forms that must be completed by OCC-registered PPSIs and foreign payment stablecoin issuers under the GENIUS Act.

### Federal Deposit Insurance Corporation

Date	Topic	Summary
6/9	<a href="#">FDIC Signals Shift Toward Streamlined Bank Resolution Planning</a>	FDIC Chairman Travis Hill outlined plans to rethink resolution readiness by reducing reliance on lengthy planning requirements, focusing on critical operational data, and improving the agency's ability to execute orderly resolutions of large, complex bank failures.

### National Credit Union Administration

Date	Topic	Summary
6/08	<a href="#">NCUA Finalizes Rule Allowing Credit Unions to Reimburse Dependent Care Expenses for Volunteer Officials</a>	The rule permits federal credit unions to reimburse board members for dependent care costs and adopt more flexible, family-friendly expense policies, removing a long-standing barrier to volunteer service.
6/08	<a href="#">NCUA Clarifies Federal Credit Unions' Authority to Charge Fees and Preempts State Restrictions</a>	The interim final rule confirms that FCUs can charge non-interest fees such as interchange fees without state interference, aligning treatment with national banks.
6/09	<a href="#">NCUA Reports Asset, Loan, and Earnings Growth in Q1 2026 Credit Union Data</a>	Federally insured credit unions saw continued balance sheet expansion and strong earnings growth in Q1 2026, with assets up 4.9%, loans up 4.6%, and net income rising 30.5% year-over-year despite ongoing consolidation.

## Recent Key Regulatory Developments

### Consumer Financial Protection Bureau

Date	Topic	Summary
6/08	<a href="#">CFPB Statement Emphasizes Considering Immigration Status in Ability to Repay Assessments</a>	In an official notice, the CFPB reminds lenders that under federal lending laws, including the <i>Truth in Lending Act's</i> ability to repay requirements, they may need to consider a borrower's immigration status when evaluating repayment capacity, particularly where the potential loss of U.S.-based income could affect future payments.
6/10	<a href="#">Brian Johnson Nominated to Lead the CFPB</a>	U.S. President Donald Trump nominated former agency Deputy Director Brian Johnson, to serve a five-year term as director of the CFPB. The nomination is pending Senate confirmation.

### Securities & Exchange Commission

Date	Topic	Summary
6/09	<a href="#">FINRA Clarifies Application of Rules for Paying Transaction-Based Compensation to Personal Services Entities</a>	FINRA Regulatory Notice 26-12 provides guidance on how existing FINRA rules apply to SEC no-action relief allowing broker-dealers to pay transaction-based compensation to registered representative-owned personal services entities without requiring broker-dealer registration.
6/11	<a href="#">SEC Proposes Rescission of Key Regulation NMS Trading Rules</a>	SEC proposed rescinding Regulation NMS Rules 611 and 610(e), eliminating the trade-through prohibition and restrictions on locked and crossed quotations to simplify market structure, reduce costs, and rely more on competition and market forces
6/11	<a href="#">FINRA Board Advances Rule Modernization and Reviews Supervisory Programs</a>	FINRA's Board approved four rule proposals tied to its FINRA Forward initiative, reviewed progress on regulatory modernization, approved the 2025 Annual Financial Report, and received briefings on enforcement, arbitration, cybersecurity, and technology investments.

### Commodity Futures Trading Commission

Date	Topic	Summary
6/08	<a href="#">National Futures Association Adjusts FCM Fees and Increases SD Member Dues</a>	NFA approved amendments to rebalance funding by temporarily cutting futures commission merchant assessment fees by 50% from July 2026 to June 2027 and increasing swap dealer member dues in phased steps beginning July 2026.
6/10	<a href="#">National Futures Association Amends Branch Office Supervision Requirements</a>	NFA amended its branch office rules effective July 2026 to allow managers to oversee multiple locations and supervise remotely, subject to risk-based analysis and enhanced supervisory procedures, while aligning requirements with FINRA to reduce burden on dual registrants.
6/10	<a href="#">CFTC Seeks Comment on Proposed Rule Addressing Event Contracts</a>	CFTC issued a proposed rule seeking public comment on the treatment of event contracts involving enumerated activities, signaling potential new regulatory parameters for these products under the <i>Commodity Exchange Act</i> .
6/11	<a href="#">CFTC Proposes Amendments to Whistleblower Rules to Increase Award Predictability</a>	CFTC issued a proposed rule to amend its whistleblower program, introducing a presumption of 30% awards for claims of \$5 million or less and aligning with SEC rules to improve efficiency, transparency, and predictability in award determinations.

## Recent Key Regulatory Developments

### Financial Accounting Standards Board

Date	Topic	Summary
6/10	<a href="#">FASB Seeks Comment on Proposed Update to Improve Accounting for Market-Return Cash Balance Plans</a>	FASB issued a proposed Accounting Standards Update to clarify discount rate requirements for measuring benefit obligations in certain market-return cash balance plans and is requesting public comment.
6/11	<a href="#">FASB Discusses Agenda Prioritization and Cash Flow Reporting</a>	FASB discussed stakeholder feedback on not-for-profit topics, earnings per share, and the statement of cash flows as part of its agenda-setting process.

### Financial Stability Board

Date	Topic	Summary
6/10	<a href="#">FSB Seeks Comment on Sound Practices for Responsible Adoption of AI in Finance</a>	FSB issued a consultation report proposing 12 sound practices to guide financial institutions' governance, risk management, and lifecycle oversight of artificial intelligence (AI), aiming to support responsible adoption and mitigate financial stability risks while seeking public feedback.

### International Organization of Securities Commissions

Date	Topic	Summary
6/8	<a href="#">IOSCO Issues Recommendations to Enhance Secondary Market Disclosure</a>	IOSCO published principles-based recommendations to modernize secondary market disclosure frameworks, promoting consistent application of disclosure standards while maintaining flexibility across jurisdictions and focusing on timely, reliable investor information post-listing.

## Deadlines & Compliance Calendar

Agency	Requirement	Due Date
FFIEC	<a href="#">Comments due on revisions to the Uniform Financial Institutions Rating System (UFIRS)</a>	Aug 17, 2026
Joint Agency	<a href="#">Comments due on regulatory capital rule &amp; the standardized approach for risk-weighted assets</a>	Jun 18, 2026
	<a href="#">Comments due on regulatory capital framework for Category I &amp; II banking organizations</a>	Jun 18, 2026
	<a href="#">Comments due on G-SIB surcharge proposal</a>	Jun 18, 2026
FRB	<a href="#">Comments due on revisions to the Federal Reserve policy on payment system risk &amp; the guidelines for account and services requests</a>	Jul 27, 2026
	<a href="#">Comments due on Regulation A: extensions of credit by Federal Reserve banks</a>	Jul 27, 2026
	<a href="#">Comments due on Regulation D: reserve requirements of depository institutions</a>	Jul 27, 2026
FDIC	<a href="#">Comments due on BSA &amp; sanction compliance standards for FDIC supervised PPSIs</a>	Aug 4, 2026
	<a href="#">Comments due on bank conversion &amp; mergers</a>	Jun 22, 2026
	<a href="#">Comments due on enhancing &amp; streamlining data collection from credit unions</a>	Jun 23, 2026
NCUA	<a href="#">Comments due on requirements for insurance</a>	Jul 6, 2026
	<a href="#">Comments due on threshold increase for the major assets prohibition of the DIMIA</a>	Jul 6, 2026
	<a href="#">Comments due on preemption-federal credit union non-interest charges &amp; fees</a>	Jul 9, 2026
	<a href="#">Comments on proposal for implementation of the GENIUS Act</a>	Jul 17, 2026
	<a href="#">Comments due on Consolidated Audit Trail &amp; other audit trails &amp; data sources</a>	Jun 22, 2026
	<a href="#">Comments due on Form PF reporting requirements</a>	Jun 23, 2026
	<a href="#">Comments due on definitions of "Security-Based Swap Dealer" &amp; "Major Security-Based Swap Participant"</a>	Jul 6, 2026
SEC	<a href="#">Comments due on semiannual reporting proposal</a>	Jul 6, 2026
	<a href="#">Comments due on proposed amendments to streamline filer statuses</a>	Jul 20, 2026
	<a href="#">Comments on registered offering reform</a>	Jul 27, 2026
	<a href="#">Comments on rescission of climate-related disclosure rules</a>	Aug 3, 2026
CFTC	<a href="#">Comments due on prediction markets; Public interest determinations</a>	Jul 27, 2026

### Effective Rule Compliance Dates

Agency	Requirement	Compliance Date
Joint Agency	<a href="#">Prohibition on the use of reputation risk by regulators</a>	Jun 9, 2026
	<a href="#">Modifications to the CBLR framework</a>	Jul 1, 2026
	<a href="#">Enhanced supplementary leverage ratio, total loss-absorbing capacity, &amp; long-term debt requirements</a>	Dec 1, 2026
OCC	<a href="#">Preemption determination on state interest-on-escrow laws</a>	Jun 18, 2026
	<a href="#">Order preempting the Illinois Interchange Fee Prohibition Act</a>	Jun 30, 2026
	<a href="#">National bank non-interest charges &amp; fees</a>	Jun 30, 2026
FDIC	<a href="#">FDIC official signs &amp; advertisement of membership</a>	Apr 1, 2027
NCUA	<a href="#">Preemption-federal credit union non-interest charges &amp; fees</a>	Jun 30, 2026
	<a href="#">Simplification of share insurance rules</a>	Dec 1, 2026
CFPB	<a href="#">Amendments to Regulation B (ECOA) - Disparate Impact</a>	Jul 21, 2026
	<a href="#">Small Business Lending Under Regulation B - Section 1071</a>	Jun 30, 2026
SEC	<a href="#">Rescission of policy regarding denials in settlements of enforcement actions</a>	May 21, 2026
	<a href="#">Form N-PORT &amp; N-CEN reporting requirements<sup>1</sup></a>	Nov 17, 2027
		May 18, 2028
CFTC	<a href="#">Rescission of policy relating to the acceptance of settlements in administrative and civil proceedings</a>	Jun 8, 2026
FinCEN	<a href="#">AML/CFT program &amp; suspicious activity report filing requirements for registered investment advisers &amp; exempt reporting advisers</a>	Jan 1, 2028

1. Compliance dates based on asset size: November 17, 2027 for fund groups with net assets of \$1 billion or more; and May 18, 2028 for fund groups with less than \$1 billion in net assets as of the end of their most recent fiscal year-end.

## Agencies Without Recent Key Developments

**Several key regulators maintained their prior positions for the period, with no new actions to report, including:**

- Legislative
- Financial Stability Oversight Committee
- Federal Financial Institutions Examination Council
- Financial Crimes Enforcement Network
- Basel Committee on Banking Supervision



# U.S. Financial Services Regulatory Center Recent FORsights™

We're committed to changes and obligations regulators demand, helping you meet business objectives and enhance shareholder value. For more information on our latest work, please see our FORsights below:



### [Quarterly Insights: Financial Services Q1 2026](#)

Download our Q1 2026 insights featuring major regulatory and supervisory developments.



### [An Overview of the Modernization of the U.S. Regulatory Capital Framework](#)

A breakdown of proposals on Revised Standardized Approach, Basel III/ERBA, and G-SIB Recalibration.



### [Implications of the Updated Interagency MRM Guidance](#)

Understand evolving guidance in model risk management.



### [Preliminary Insights on the OCC's Proposed Stablecoin Framework](#)

Preliminary insights on the OCC's proposed stablecoin framework and why it matters today for banks.



### [FFIEC Proposes Sweeping Overhaul of CAMELS Framework](#)

Discover proposed CAMELS overhaul linking ratings to material risk and transparency.



### [SEC Allows Broker-Dealers to Use Equities as Collateral](#)

The SEC allows equity collateral under Rule 15c3-3, boosting flexibility with strong controls.



### [Reframing AML for Digital Finance](#)

FinCEN proposes AML reforms for financial institutions and stablecoin issuers, emphasizing effectiveness.



### [Forvis Mazars' View: The Revitalization of Bank Mortgage Lending](#)

The FRB signals capital changes to revive bank mortgage lending for community and regional banks.

# Contact



**Ashley Ensley**

National Sector Leader, Financial Services  
[ashley.ensley@us.forvismazars.com](mailto:ashley.ensley@us.forvismazars.com)



**William Rogers**

Financial Services Risk & Regulatory Practice Leader  
[william.rogers@us.forvismazars.com](mailto:william.rogers@us.forvismazars.com)

## U.S. Financial Services Regulatory Center



**Bobby Bean**

U.S. Financial Services Regulatory Center Leader  
[US\\_Reg\\_Center@us.forvismazars.com](mailto:US_Reg_Center@us.forvismazars.com)



**Desmond Lites**

Senior Manager, Financial Services  
Risk & Regulatory Consulting



**Zach Kindbom**

Manager, Financial Services Risk &  
Regulatory Consulting

Disclaimer: The tables in this document are for general educational purposes only and are not intended as legal advice and should not be construed as a legal analysis of compliance requirements. This is not intended to constitute an advertisement, a solicitation, or professional advice as to any particular situation.