







December 7, 2020 Via electronic mail

Ann E. Misback, Secretary Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Washington, DC 20551

Re: Input on Draft SR Letter Clarifying the Firms Subject to the Large Institution Supervision Coordinating Committee ("LISCC") Supervisory Program

#### Ladies and Gentlemen:

The Securities Industry and Financial Markets Association ("SIFMA"), the Institute of International Bankers ("IIB"), the Bank Policy Institute ("BPI"), and the American Bankers Association ("ABA")¹ appreciate the opportunity to comment on the draft SR Letter issued by the Board of Governors of the Federal Reserve System (the "Board") defining the financial institutions subject to the Large Institution Supervision Coordinating Committee ("LISCC") supervisory program as institutions subject to Category I standards under the Board's tailoring framework, as well as the Board's request for input on the appropriate criteria for including international banks in the LISCC program in the future should the risk of their U.S. operations increase.²

<sup>&</sup>lt;sup>1</sup> See Appendix 2 for a description of the associations.

<sup>&</sup>lt;sup>2</sup> Draft SR Letter, "Firms Subject to the LISCC Supervisory Program." Available at: <a href="https://www.federalreserve.gov/newsevents/pressreleases/files/bcreg20201106a1.pdf">https://www.federalreserve.gov/newsevents/pressreleases/files/bcreg20201106a1.pdf</a>. The provisions of the SR Letter are intended to become effective on January 1, 2021. Specifically, the draft SR letter defines financial institutions that will be subject to the LISCC supervisory program as (i) any firm subject to Category I standards under the Board's tailoring framework, (ii) any non-commercial, non-insurance savings and loan company that would be identified for Category I standards if it were a bank holding company, and (iii) any nonbank financial institution designed as systemically important by the Financial Stability Oversight Council ("FSOC").

We strongly support the Board's decision to define the financial institutions subject to the LISCC program as any firm subject to Category I tailoring standards and recommend it continue to use this same applicability definition when it updates the draft SR Letter prior to March 31, 2021. We also outline *additional* applicability criteria that the Board could consider should the risk of any international bank's U.S. operations significantly increase in the future.

# Decision Appropriately Reflects the Reduced Size and Risk Profile of the LISCC International Banks

The Board's decision provides a transparent and simplified approach that is grounded in regulation and prior tailoring efforts, which we support. It is also fully consistent with the intentions of Section 165 of the Dodd-Frank Act<sup>3</sup>, which empowered the Board to establish enhanced regulatory standards for "large, interconnected financial institutions" that "are more stringent than the standards…applicable to [financial institutions] that do not present similar risks to the financial stability of the United States" and "increase in stringency" in proportion to the systemic importance of the financial institution in question.

For international banks operating in the United States, the decision appropriately reflects the substantive reductions in their footprint and risk profile since the establishment of the LISCC program. When the LISCC program was created in 2010, the international banks within the portfolio had vastly larger U.S. footprints – in terms of both size and risk profile – than they do today. Vice Chair Quarles acknowledged this in remarks in January 2020:

Since 2010, the LISCC [international banks] have significantly shrunk their U.S. footprint, and their U.S. operations are much less risky than they used to be. Since 2008, the size of the LISCC [international banks'] combined U.S. assets has shrunk by about 50 percent, and they have reduced the assets at their broker-dealers from a peak of \$1.9 trillion in 2008 to \$340 billion today, a reduction of over 80%. In addition, the estimated systemic impact of the LISCC [international banks] today is much smaller than the U.S. GSIBs ["Global Systemically Important Banks"]. The average method 1 GSIB score of the combined U.S. operations of the LISCC [international banks] is less than a quarter of the average GSIB score of the six non-processing U.S. GSIBs.<sup>4</sup>

As the IIB letter, submitted earlier this year in relation to the proposed resolution plan guidance for certain large international banks noted,<sup>5</sup> the three remaining LISCC international banks have reduced the aggregate size of their Intermediate Holding Companies ("IHCs") by 38% (from \$605 billion to \$374

<sup>&</sup>lt;sup>3</sup> 12 U.S.C. § 5365 (a)(1).

<sup>&</sup>lt;sup>4</sup> Vice Chair for Supervision Randal K. Quarles, "Spontaneity and Order: Transparency, Accountability, and Fairness in Bank Supervision" (Jan. 17, 2020) (hereafter referred to as Quarles remarks on supervision).

<sup>&</sup>lt;sup>5</sup> Institute of International Bankers, Comment Letter on the Proposed Guidance, June 4, 2020, p. 5. Available at: <a href="https://www.federalreserve.gov/SECRS/2020/June/20200615/OP-1699/OP-1699-060420">https://www.federalreserve.gov/SECRS/2020/June/20200615/OP-1699/OP-1699-060420</a> 137282 438389509547 1.pdf.

billion) between 2016 and 2019, and have reduced their aggregate broker-dealer assets by 45% (from \$475 billion to \$262 billion).<sup>6</sup> As a result, the assets of the remaining LISCC international banks are a small fraction of those of the non-processing U.S. GSIBs (see Figures 1 and 2 in Appendix A, which compare their total IHC and Combined U.S. Operations ("CUSO") assets to those of the six non-processing U.S. GSIBs).

Today, these institutions also have a dramatically reduced risk profile. Figures 3 and 4 in Appendix 1 include a broad range of systemic risk indicators outlining the limited risk profile of these institutions. The current systemic footprint of the LISCC international banks is extraordinarily small compared to the other members of the LISCC program. For example, the average method 1 GSIB score for the IHCs of LISCC international banks is just 14 percent that of the six non-processing U.S. GSIBs, while the average method 1 GSIB score for the international banks' CUSOs is only 20 percent that of the six GSIBs.<sup>7</sup>

It is clear then that these firms are no longer of the size or risk profile of other LISCC institutions. Therefore, as Vice Chair Quarles rightly acknowledged, "there is a compelling justification" to remove the LISCC international banks from the program.<sup>8</sup> This will enhance the efficiency and effectiveness of the Board's oversight of both the U.S. GSIBs and the affected international banks, ensuring that each set of firms are more appropriately compared to their peer groups.

# Use of Additional Applicability Criteria

We strongly believe that the tailoring Category I standards should continue to be used to define which firms are included in the LISCC program when the Board updates the draft SR Letter prior to March 31, 2021. However, the Board could consider adopting *additional* criteria that would allow for international banks to be scoped into the LISCC program should the risk posed by their U.S. operations significantly increase in the future. The most appropriate additive scoping mechanism in this instance would be to use the Method 1 GSIB scoring methodology, with the Board adopting the existing regulatory threshold it uses to categorize firms as U.S. GSIBs as the criteria for inclusion in LISCC.<sup>9</sup> The GSIB Method 1 framework has the benefit of being consistent with the tailoring rules<sup>10</sup>, while providing a mechanism that would allow

<sup>&</sup>lt;sup>6</sup> See National Information Center, <a href="https://www.ffiec.gov/NPW">https://www.ffiec.gov/NPW</a> (total asset data taken from Form Y-9Cs filed for fourth quarter 2016 through fourth quarter 2019).

<sup>&</sup>lt;sup>7</sup> Additional data points illustrating this decline in risk profile are discussed in the joint trades response to the proposed resolution plan guidance for certain large international banks. See BPI, ABA, and SIFMA, Comment Letter on Proposed Guidance, June 1, 2020. Available at:

<a href="https://www.federalreserve.gov/SECRS/2020/June/20200615/OP-1699/OP-1699">https://www.federalreserve.gov/SECRS/2020/June/20200615/OP-1699/OP-1699 060120 137280 376548449594 1.pdf</a>.

<sup>&</sup>lt;sup>8</sup> Quarles remarks on supervision.

<sup>9 12</sup> U.S.C. § 217.402.

<sup>&</sup>lt;sup>10</sup> We address the use of alternative scoping methodologies that are inconsistent with the tailoring rules (as well as international standards) in our trade associations' various letters on the proposed resolution plan guidance for certain large international banks.

for the inclusion of international banks in the LISCC program should they grow to a size and scope that made them comparable to the U.S. GSIBs.

We understand that it is not the Board's intent to adopt criteria that would re-scope international banks into the LISCC program when it issues its updates to the draft SR Letter in March 2021. However, to the extent that the Board wishes to make further changes to the applicability criteria for the program, they should first seek public comment.

\* \* \*

We appreciate your consideration of our input on this draft SR Letter. If you have any questions regarding this letter, please contact the undersigned.

Sincerely,

Peter J. Ryan

Managing Director, Head of International Capital Markets and Prudential Policy Securities Industry and Financial Markets Association

Stephanie Webster General Counsel

Institute of International Bankers

Lauren Anderson

Senior Vice President and Associate General Counsel

Danie Webster

Bank Policy Institute

Justin M. Underwood

Vice President, Banking Policy American Bankers Association

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# Appendix I: Asset Size and Systemic Risk Comparisons Between Non-Processing LISCC Firms

Figure 1: Total Assets of Non-Processing LISCC Firms as of Q2 2020 (IHC Basis)

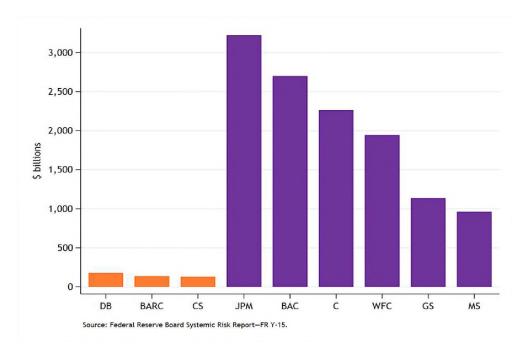


Figure 2: Total Assets of Non-Processing LISCC Firms as of Q2 2020 (CUSO Basis)

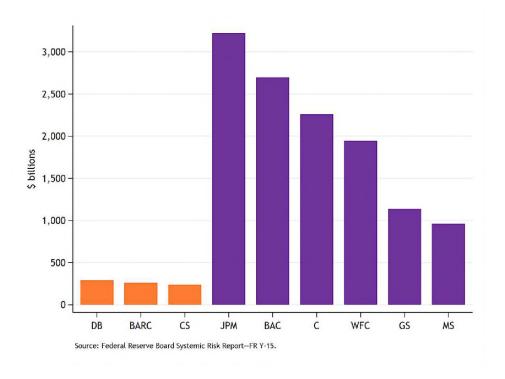


Figure 3: Systemic Risk Indicators of Non-Processing LISCC Firms as of Q2 2020 (IHC Basis)

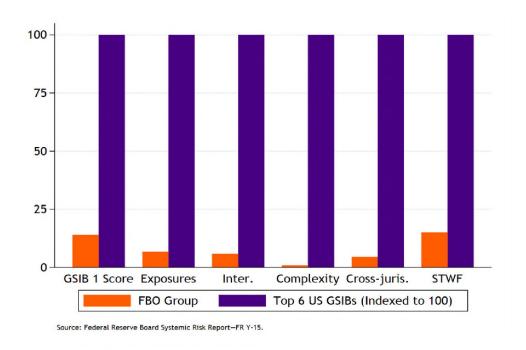
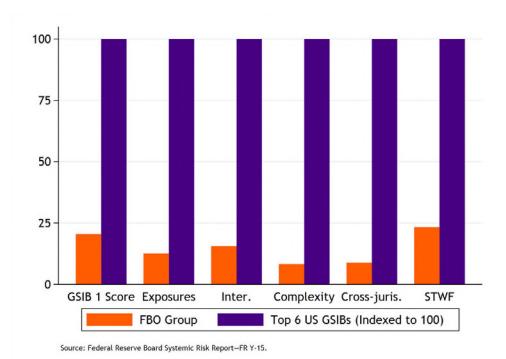


Figure 4: Systemic Risk Indicators of Non-Processing LISCC Firms as of Q2 2020 (CUSO Basis)



# **Appendix 2: Description of the Associations**

# **American Bankers Association (ABA)**

The American Bankers Association is the voice of the nation's \$21.1 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard nearly \$17 trillion in deposits and extend nearly \$11 trillion in loans.

# **Bank Policy Institute (BPI)**

The Bank Policy Institute is a nonpartisan public policy, research and advocacy group, representing the nation's leading banks and their customers. Our members include universal banks, regional banks and the major foreign banks doing business in the United States. Collectively, they employ almost 2 million Americans, make nearly half of the nation's small business loans, and are an engine for financial innovation and economic growth.

# Institute of International Bankers (IIB)

The Institute of International Bankers is the only national association devoted exclusively to representing and advancing the interests of the international banking community in the United States. Its membership is comprised of internationally headquartered banking and financial institutions from over 35 countries around the world doing business in the United States. The IIB's mission is to help resolve the many special legislative, regulatory, tax, and compliance issues confronting internationally headquartered institutions that engage in banking, securities and other financial activities in the United States. Through its advocacy efforts the IIB seeks results that are consistent with the U.S. policy of national treatment and appropriately limit the extraterritorial application of U.S. laws to the global operations of its member institutions.

#### Securities Industry and Financial Markets Association (SIFMA)

SIFMA is the leading trade association for broker-dealers, investment banks, and asset managers operating in the U.S. and global capital markets. On behalf of our industry's nearly 1 million employees, we advocate on legislation, regulation, and business policy affecting retail and institutional investors, equity and fixed income markets, and related products and services. We serve as an industry coordinating body to promote fair and orderly markets, informed regulatory compliance, and efficient market operations and resiliency. We also provide a forum for industry policy and professional development. SIFMA, with offices in New York and Washington, D.C., is the U.S. regional member of the Global Financial Markets Association (GFMA).



#### **December 7, 2020**

Submitted via electronic mail to: regs.comment@federalreserve.gov

Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue, NW Washington, DC 20551 Attention: Ann E. Misback, Secretary

**RE: LISCC Supervisory Program Reform** 

# Secretary Misback:

Credit Suisse Holdings (USA), Inc. ("Credit Suisse") welcomes the opportunity to provide input on the Large Institution Supervision Coordination Committee ("LISCC") supervisory portfolio of the Federal Reserve System's Board of Governors (the "Board"). Credit Suisse unequivocally supports the Board's decision to remove the remaining U.S. operations of foreign banking organizations ("FBOs") from the LISCC supervisory portfolio and to move them into the Large and Foreign Banking Organization ("LFBO") supervisory portfolio. Furthermore, Credit Suisse strongly agrees with the Board's decision to align the composition of institutions in LISCC to Category I firms under the Tailoring Rules.<sup>2</sup>

The Board's decision to remove FBOs from the LISCC supervisory portfolio aligns with the original intent of LISCC. The LISCC supervisory portfolio was created in the wake of the 2008 financial crisis (the "Crisis") to increase supervision of those firms that posed the greatest systemic risk to the U.S. economy.<sup>3</sup> However, in the time since the Crisis and the creation of the LISCC framework, the FBOs in the LISCC portfolio have dramatically reduced their risk profiles and no longer represent the same systemic risk that may have warranted their initial inclusion.<sup>4</sup> Thus, the Board's revisiting of the applicability of the LISCC supervisory portfolio is prudent.

The Board's decision is also consistent with congressional intent<sup>5</sup> and the recent efforts by the Board and other prudential regulators to tailor banks' regulatory requirements to their risk profiles.<sup>6</sup> One fundamental principle of the Tailoring Rules is to apply appropriate regulatory requirements on firms with similar risk profiles. Echoing Vice Chair Quarles' statements, Credit Suisse agrees that it is appropriate to

<sup>&</sup>lt;sup>1</sup> Board of Governors, "Federal Reserve publishes latest version of its supervision and regulation report," November 6, 2020. Available at: <a href="https://www.federalreserve.gov/newsevents/pressreleases/bcreg20201106a.htm">https://www.federalreserve.gov/newsevents/pressreleases/bcreg20201106a.htm</a>.

<sup>&</sup>lt;sup>2</sup> 84 FR 59032 and 84 FR 59230 (with the latter adopted by the Board, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation) (together, the "Tailoring Rules").

<sup>&</sup>lt;sup>3</sup> Board of Governors, "SR 12-17/CA 12-14: Consolidated Supervision Framework for Large Institutions," December 17, 2012. Available at: <a href="https://www.federalreserve.gov/supervisionreg/srletters/sr1217.htm">https://www.federalreserve.gov/supervisionreg/srletters/sr1217.htm</a>.

<sup>&</sup>lt;sup>4</sup> Vice Chair Quarles, "Spontaneity and Order: Transparency, Accountability, and Fairness in Bank Supervision," January 17, 2020. Available at: <a href="https://www.federalreserve.gov/newsevents/speech/files/quarles20200117a.pdf">https://www.federalreserve.gov/newsevents/speech/files/quarles20200117a.pdf</a>.

<sup>&</sup>lt;sup>5</sup> Public Law No: 115-174, "Economic Growth, Regulatory Relief, and Consumer Protection Act," May 24, 2018.

<sup>&</sup>lt;sup>6</sup> See the Tailoring Rules.

align the Board's supervisory portfolios with its Tailoring Rules. By removing the remaining FBOs from LISCC and placing them into the LFBO supervisory portfolio, the Board ensures those firms are supervised in an appropriate manner consistent with peers that have similar risk profiles.

Credit Suisse also supports the trade associations' recommendation to align any future inclusion of foreign banks in a manner consistent with the Tailoring Rules and the Method 1 GSIB scoring methodology. Though Credit Suisse strongly believes that the criteria proposed by the Board accurately captures those firms that pose the greatest systemic risk to the U.S. economy, the potential inclusion of the Method 1 GSIB scoring methodology ensures that the Board's criteria for inclusion in the LISCC program is aligned with other measurements of systemic risk currently employed by the Board.

\* \* \*

Credit Suisse greatly appreciates the Board's consideration of these comments and supports the decision to move the remaining FBOs from the LISCC supervisory portfolio into the LFBO supervisory portfolio. Should you have any questions, please do not hesitate to contact Keaghan Ames at (202) 626-3307 (Patrick.Ames@credit-suisse.com).

Respectfully submitted,

Evic M. Varel

Eric Varvel

CEO of Credit Suisse Holdings (USA), Inc.

Cc:

Randal Quarles, Vice Chair for Supervision
Michael S. Gibson, Director of Division of Supervision and Regulation

<sup>&</sup>lt;sup>7</sup> Vice Chair Quarles, "Spontaneity and Order: Transparency, Accountability, and Fairness in Bank Supervision," at 7, January 17, 2020. Available at: <a href="https://www.federalreserve.gov/newsevents/speech/files/quarles20200117a.pdf">https://www.federalreserve.gov/newsevents/speech/files/quarles20200117a.pdf</a>.

<sup>&</sup>lt;sup>8</sup> Specifically, Credit Suisse supports the joint-trade letter submitted by the Institute of International Bankers, Securities Industry and Financial Markets Association, Bank Policy Institute, and American Bankers Association.



Debevoise & Plimpton LLP 801 Pennsylvania Avenue, N.W. Washington, D.C. 20004 +1 202 363 8000

December 7, 2020

# **BY EMAIL**

Ann E. Misback Secretary Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Washington, DC 20551

# Comment on Proposed SR-XX re: Firms Subject to the LISCC Supervisory Program

#### Dear Ladies and Gentlemen:

We are writing on behalf of one of our clients regarding the Federal Reserve Board's (the "FRB") announcement that it will update the list of firms subject to the Large Institution Supervision Coordinating Committee ("LISCC") supervisory program. We appreciate the opportunity to provide the FRB input on this important initiative and respectfully put forth a recommendation in furtherance of the FRB's objectives.

We strongly support the FRB's proposal to limit inclusion in the LISCC supervisory program to Category I firms; non-commercial, non-insurance savings and loan holding companies that would be identified for Category I standards if they were bank holding companies; and nonbank financial institutions designated as systemically important by the Financial Stability Oversight Council (the "LISCC Proposal"). The LISCC Proposal is consistent with the 2019 tailoring rules (the "Tailoring Rules"), which tailored the application of various regulatory requirements to large banking organizations based on their risk profiles and complexities. We also applaud the FRB's efforts and commitments thus far in supervision tailoring; such efforts are critical to ensure that more tailored regulatory requirements are consistently reflected in the supervisory environment, and that risk management expectations are proportionate to the level of systemic risk inherent in the profiles of supervised firms.

<sup>&</sup>lt;sup>1</sup> 84 Fed. Reg. 59032 (Nov. 1, 2019).

In principle, we believe the FRB should conduct its prudential regulatory supervision of firms based on their respective tailoring categorizations and systemic risk profiles. For example, Category III firms should be supervised alongside their peers in the same tailoring category in any horizontal reviews to ensure that any expectations or "best practices" derived from such horizontal reviews are appropriate and proportionate to the risk profiles of Category III firms.

As explained below, we believe the FRB's supervision of the capital planning and positions of large banking organizations should be further tailored to reflect the different risk categories of the Tailoring Rules. In particular, we recommend that the capital planning activities of Category III firms be assessed in the Horizontal Capital Review (the "HCR") as a part of the Large and Foreign Banking Organization (the "LFBO") supervisory program, rather than as a part of the CCAR qualitative assessment conducted as a part of the LISCC supervisory program.<sup>2</sup> Our recommendation is consistent with the LISCC Proposal, which limits the LISCC supervisory program to Category I firms. Our recommendation also is consistent with the FRB's tailored approach to liquidity supervision (i.e., only LISCC firms are subject to the Comprehensive Liquidity Analysis and Review of the LISCC supervisory program).

As recognized in the Tailoring Rules, Category III firms are less complex than Category I firms and do not present similar systemic risks to U.S. financial stability. The risk profiles of Category III firms generally are more comparable to those of Category IV firms than internationally active and systemically important Category I firms. Accordingly, we believe that a more targeted capital adequacy review under the HCR is more appropriate than the CCAR qualitative assessment for Category III firms.

In addition, our recommendation would promote greater consistency in the supervision of regional banking organizations, because all of the FRB's supervisory activities with respect to such organizations would be conducted under the oversight of the LFBO management group. It also would further align the supervisory practices for capital planning to those of liquidity planning. Moreover, our recommended approach would promote greater efficiency as it facilitates tailoring of supervisory expectations for Category III firms based on learnings from similarlysituated firms, rather than the generally larger and more complex Category I firms.

Our recommendation would not require any revisions to the FRB's capital plan rule. Although the applicability of a qualitative objection under the capital plan rule depends in part on whether a bank holding company is "large and noncomplex," the rule does not require the FRB to determine the applicability of the CCAR qualitative assessment or otherwise

differentiate supervision on that basis. See 12 CFR 225.8(i)(2). Alternatively, the FRB could revise the definition of "large and noncomplex bank holding company" under the capital plan

rule to include both Category III and Category IV firms.

Finally, we believe our recommendation would better align the FRB's capital planning supervisory activities with the underlying policy objectives of the Tailoring Rules, while still promoting consistency of supervisory assessments and the overall capital resiliency of banking organizations.

\* \* \*

If the FRB staff would like additional information regarding these comments, we and our client would be happy to discuss. Please do not hesitate to reach out to me at 202-383-8190 or via e-mail at <a href="mailto:smkini@debevoise.com">smkini@debevoise.com</a>, or Chen Xu at 212-909-6171 or <a href="mailto:cxu@debevoise.com">cxu@debevoise.com</a>.

Best regards,

Satish M. Kini

Setil y 16

From: Roger M Lund

To: Office of Secretary@FRB.GOV Date: 11/9/2020 3:42:46 PM

Subject: LISCC Program

NONCONFIDENTIAL // EXTERNAL

Please let all the fed chair and Mr Powell specifically know that I trademarked the Star of Solomon also known as the Mark of the Beast. Please do not disregard it or call me crazy. There are hugely historic and spiritual blessing or consequences involved here. I come in peace. I want good things for humanity.

This has to happen. Don't be scared, whomever reads this. Just pass it along to him. The old Kansas City Reserve building even has the hexagrams carved in the old building.

Roger Matthew Lund

This is the True "False Crown of Iris". Lol

- P.S. The Great Work of Spiritual Banking for the last 6000 years hasn't even started yet until everyone is politically sovereign so that once he or she sells his soul to God or the Devil it ACTUALLY COUNTS.
- 1. Truth + Love = Life® The Seal of God in the Bible is HERE The "New Name of God" and the Key of David of Philadelphia 3:3

https://www.youtube.com/watch?v=z3ktfGCOTeA [https://www.youtube.com/watch?v=z3ktfGCOTeA]

2. The Why of Jesus Shed Blood Revealed for the First Time in History!!!

https://www.youtube.com/watch?v=mP9-uDavVrl [https://www.youtube.com/watch?v=mP9-uDavVrl]

https://www.youtube.com/watch?v=Gm8pW4yhu8M [https://www.youtube.com/watch?v=Gm8pW4yhu8M]

3. The Trademarked Mark of the Beast with Photo!!!

https://www.youtube.com/watch?v=cpKCyGiumx0 [https://www.youtube.com/watch?v=cpKCyGiumx0]

https://www.youtube.com/watch?v=hZ74gfOSWLM [https://www.youtube.com/watch?v=hZ74gfOSWLM]

4. No such thing as abortion the Debate is Over!!!

https://www.youtube.com/watch?v=j0Fhdwn4D9U [https://www.youtube.com/watch?v=j0Fhdwn4D9U]

Abraham Isaac Jacob Greatest Daddy Ever LOVING BEYOND DESCRIPTION

https://www.youtube.com/watch?v=JitlaJ1yelo[https://www.youtube.com/watch?v=JitlaJ1yelo]

5. The Baseball Dimaond Paradigm New Political Paradigm for the MILLENNIUM

https://www.youtube.com/watch?v=hnoCRG9rMAg [https://www.youtube.com/watch?v=hnoCRG9rMAg]

6. The Why of the Virgin Birth Revealed Forever!!!

https://www.youtube.com/watch?v=ZPIf81sf0JI [https://www.youtube.com/watch?v=ZPIf81sf0JI]

7. The War on Drugs Ended in 5 Minutes!!!

https://www.youtube.com/watch?v=HJ8mSt4lGes[https://www.youtube.com/watch?v=HJ8mSt4lGes]

8. The Resolution of Works and Grace Revealed Forever!!!

https://www.youtube.com/watch?v=\_htjGeeM610 [https://www.youtube.com/watch?v=\_htjGeeM610]

9. L FRANK BAUM WIZARD OF OZ'S UPLIFTING LUCIFER PLAY

https://www.youtube.com/watch?v=pnClxgU2aAE [https://www.youtube.com/watch?v=pnClxgU2aAE]

10. SATAN MUST SET HUMANITY FREE POLITICALLY IN ORDER TO GET CLEAR TITLE TO THE SOULS IN HELL EVERYTHING HE HAS RECEIVED FOR 6000 YEARS IS WORTHLESS

https://www.youtube.com/watch?v=yqlOm\_03lh4 [https://www.youtube.com/watch?v=yqlOm\_03lh4]

From: Jesse Crowe

To: Office of Secretary@FRB.GOV
Date: 11/12/2020 5:09:05 PM
Subject: LISCC Program

# NONCONFIDENTIAL // EXTERNAL

In supportive options to the distribution of free: musical, lyrics, coreography, futuristic selfideaology public announcement of experience based knowledge to persons in pycosis and "real life situations" and the collaborative connection with the world with media, religion, education, world diplomacy, patriotism, innovation. Proposition "run[DOS:harddisk:Partition:C:// user.app.data.input.variable.whole.decimal.fraction.percent.forward.export.import.key.card.hybrid.rem ote.atm.vin .com 'nt'roll'e'r(.ECFR,CFR, $\xi$ , $\tau$ ,\*,#,\*££, $\xi$ 0~%]\$#,"AUTH0"

^/S/JesseCrowe

From: whitney phillips

To: Office of Secretary@FRB.GOV Date: 11/22/2020 1:53:20 AM Subject: LISCC Program

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Need aid n assist my fleet car etc

	<b>Forwarded</b>	Message	
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From: Wenston Mallapre

To: Office of Secretary@FRB.GOV

Date: 11/24/2020 5:42:16 AM

Subject: LISCC Program

From: Ljubisa Kovacevic

To: Office of Secretary@FRB.GOV
Date: 11/24/2020 2:15:50 PM
Subject: LISCC Program

NONCONFIDENTIAL // EXTERNAL

Dear Fed team,

Creative approach for new monetary system,

Here below is a model for new digital currency distribution :

[New%20Money.htm.png]

Kind regards, Ljubisa Kovacevic.

Sent with [ProtonMail](https://protonmail.com) Secure Email.

# Central Bank Digital Currency /Fed Coins/New Moneta/The Great Reset Money/

Money spent by people is different by region, status, needs, desires, purpose. All money is spent by and for consumers, customers, services, investments, fees. Distribution of new money should be carefully spread into sectors, services, regions and industries.

That way control is easier to manage and follow.

There should be 7 different types of coins (by color) that can be spend only for certain needments.

F	W	m	n	0	

Total for:	Unline shopping	Customers	Consumers	Services	Commodities	Health care	■## dic utility
balance	1000	2000	550	5000	1200	2500	3000
fees %	3	2.5	2	3	2	3.5	5
tax %					5	5	15

This way is easier to follow each categories Infaltion, interest rate, spending time and can be adjusted separately as needed to keep steady economy flow.

100 Coins Services 100 Coins Public Utility

100 Coins Online shopping

Every person have spending statistics data profile (SSDP) that can be monitored and controled.

by LjK

From: bbillb

To: Office of Secretary@FRB.GOV Date: 11/24/2020 2:43:41 PM Subject: LISCC Program

Subject. Lisce Program

# NONCONFIDENTIAL // EXTERNAL

I received an email supposedly from the federal reserve, saying I had large amount of money in 3 banks, and they wanted my bank information to give it to me. Thank you for whatever info you give me to stop this. Sent from my Verizon, Samsung Galaxy smartphone

From: budnik salomon

To: Office of Secretary@FRB.GOV
Date: 11/26/2020 5:47:02 PM
Subject: LISCC Program

NONCONFIDENTIAL // EXTERNAL

Dear Sirs,

to mitigate the Corona-19 financial damages and make Washington, DC the global monetary securities trade center, we offer you new monetary instruments designed by us: global energounits, porto-dollars, porto-euros and intl. maritime bonds as Critical Mission Solutions for the befits of the US ports, the US economy and Treasury.

Your FED could also implement our fintech/digital economy, risk management and debt restructuring project for enterprises and state debt restructuring project with no sovereign liability per our projects and my two new theories of macroeconomics.

Info about said securities and projects is available and you might advise thereby the Pres. Biden on new economic monetary policy of his administration.

We suggest your strategic cooperation with the Bank of Israel with our help to establish the monetary trade par value between dollar and shekel as a bilateral currency, as Russia and China trade at rubble-yuan parity beyond ForEx volatilty. This would make the U.S.S a critical mission currency, to consolidate the foreign states' dollars as that in CA, SG, AU, HK, etc. into uniform multilateral monetary system to counteract the euro and yuan and the EU and Chinese trade systems per our strategic initiative state above to prevent intl. trade wars and excessive trade tariffs.

In said matters, Sovereign Monetary Arbitrage can be provided by our own intl. arbitrage court, and the intl. monetary arbitrage bonds could be issued by you for trillions of dollars to settle intl. monetary and trade disputes with our help within 45 days per Israel Arbitrage Law.

Regards,

Prof. Solomon Budnik,

owner,

UTG-PRI LTD.

president,

Public Tribunal & Arbitrage Intl.

Tel Aviv

website http://ptai.co.il/location(http://ptai.co.il/location/)Tel.:

972-3-7399645972-547225389

From: Mike

To: Office of Secretary@FRB.GOV Date: 11/27/2020 9:23:07 AM

Subject: LISCC Program

# NONCONFIDENTIAL // EXTERNAL

Test

Sent from my iPhone

From: Brah dOb

To: Office of Secretary@FRB.GOV Date: 11/30/2020 2:20:47 PM

Subject: LISCC Program

NONCONFIDENTIAL // EXTERNAL

2202 2522 Calling about inspector general job

B. Baldwin

From: Kenny Vawter

To: Office of Secretary@FRB.GOV Date: 12/1/2020 2:29:04 PM

Subject: LISCC Program

### NONCONFIDENTIAL // EXTERNAL

\*Board of Governors,I understand this isn't how it works please make an exception Considering the circumstances. I have a retainer code at Wells Fargo in AmericaAcct# Routing number It's a law enforcement contract crime assassination attempt on my life...870 million people stole my identity using aliases, citizenship, multiple Existences occupying the same existence and paid for code names. They placed bets in Las Vegas Nevada to ruin my MLB Hall of Fame Career. Please remove my name from international homosexual, pedophile, sex offender, child molester, mobster, slander, libel, porno and addict Registries. Review my name and clean it up.. Remove aliases Property purchased in my name using aliasesMultiple emails were included without intentions to sound redundant.Im adding information.Do what your license permits.Return my inheritance..Please return what you recover to my bank account I would greatly appreciate it. I've contacted other attorneys but there are so many different Existences I don't know license ExistencesTake what you \*\*\*need\*\*\*My internet and cell phone were calibrated preventing correspondence or calls outside of predicted future outcomes. I've been searching for attorneys for 7 years. There are over 900,000-870 million law enforcement existencesLet me know...Seeking legitimate counsel Legitimate Referral Legitimate Residence.\*\*Legitimate Counsel Retainer\*\*Code at Wells Fargo.It was set up by the Vibrational Realm not Law enforcement\*\*\*\*I'm in my truck over 3 years\*\*\*\*\* I apologize for my email format. I had no intentions to make it difficult to read. Ive had my memory erased over 900 Decillion times... It was Team USA President Mike Gaski, authenticity Divisions and federal contract killing franchises targeting my email and income Outcome... I was set up and framed by a computer generated existence that met a criteria.

\*https://photos.app.goo.gl/CKpKq9zKGE1fVi278 [https://photos.app.goo.gl/CKpKq9zKGE1fVi278]\*

\*Kenny Vawter\*

\*Legal Shield Membership #
CEO/Founder/Outcome
Kenny Vawter (outcome)

b:

a: 2916 S. 132 Street Box 140

From: Counsel Seeking

To: Office of Secretary@FRB.GOV Date: 12/1/2020 2:29:16 PM

Subject: LISCC Program

### NONCONFIDENTIAL // EXTERNAL

\*Board of Governors,I understand this isn't how it works please make an exception Considering the circumstances. I have a retainer code at Wells Fargo in AmericaAcct# Routing number It's a law enforcement contract crime assassination attempt on my life...870 million people stole my identity using aliases, citizenship, multiple Existences occupying the same existence and paid for code names. They placed bets in Las Vegas Nevada to ruin my MLB Hall of Fame Career. Please remove my name from international homosexual, pedophile, sex offender, child molester, mobster, slander, libel, porno and addict Registries. Review my name and clean it up.. Remove aliases Property purchased in my name using aliasesMultiple emails were included without intentions to sound redundant.Im adding information.Do what your license permits.Return my inheritance..Please return what you recover to my bank account I would greatly appreciate it. I've contacted other attorneys but there are so many different Existences I don't know license ExistencesTake what you \*\*\*need\*\*\*My internet and cell phone were calibrated preventing correspondence or calls outside of predicted future outcomes. I've been searching for attorneys for 7 years. There are over 900,000-870 million law enforcement existencesLet me know...Seeking legitimate counsel Legitimate Referral Legitimate Residence.\*\*Legitimate Counsel Retainer\*\*Code at Wells Fargo.It was set up by the Vibrational Realm not Law enforcement\*\*\*\*I'm in my truck over 3 years\*\*\*\*\* I apologize for my email format. I had no intentions to make it difficult to read. Ive had my memory erased over 900 Decillion times... It was Team USA President Mike Gaski, authenticity Divisions and federal contract killing franchises targeting my email and income Outcome... I was set up and framed by a computer generated existence that met a criteria.

\*https://photos.app.goo.gl/CKpKq9zKGE1fVi278 [https://photos.app.goo.gl/CKpKq9zKGE1fVi278]\*

\*Kenny Vawter\*

\*Legal Shield Membership #
CEO/Founder/Outcome
Kenny Vawter (outcome)

b:

a: 2916 S. 132 Street Box 140

From: Mamadou Lamine Barry
To: Office of Secretary@FRB.GOV
Date: 12/2/2020 11:52:11 AM

Subject: LISCC Program

# NONCONFIDENTIAL // EXTERNAL

Trying to send You my resume as pictures

From: Antonio Ramunno

To: Office of Secretary@FRB.GOV Date: 12/3/2020 4:11:45 AM

Subject: LISCC Program

#### NONCONFIDENTIAL // EXTERNAL

Dear Ladies and Gentlemen

Thank you for your quick reply. I am referring to the question and answer below. I ask you politely to instruct me who, in your opinion, has to pay off the binding compensation payment? Sincerely

without prejudice UCC 1-308 Antonio Ramunno

Dear Antonio Ramunno:

Thank you for your recent correspondence to the Federal Reserve Board.

The issues you discussed and the assistance you sought are outside this agency's purview. Your email, however, gives me the opportunity to tell you about the Federal Reserve. The Federal Reserve conducts the nation's monetary policy; supervises and regulates financial institutions and activities; promotes consumer protection and community development; promotes financial system stability; and fosters payment and settlement system safety and efficiency.

I regret that we were unable to assist you, but I hope that you will be able to resolve this matter. Please know that this email account is not monitored. If you have additional questions, please use the "Contact Us" form at https://www.federalreserve.gov/apps/ContactUs/feedback.aspx [https://www.federalreserve.gov/apps/ContactUs/feedback.aspx]

Sincerely, Board Staff

From: Antonio Ramunno

[mailto

11

Date: Sunday, November 22, 2020 12:00 AM Reference Number: 202000165962

#### Dear Ladies and Gentlemen

I am demanding payment of damages on the basis of the One People's Trust and refer to the document DECLARATION OF FACTS: UCC Doc # 2012127914 Nov 28 2012. In view of the fact that the exclusion of the banks and all governments worldwide has been documented and that no sufficient verified rebuttal answers as well as evidence of a legally binding contract between the aforementioned persons in the UCC DOC 2012127914, the consensus has been approved.

They missed me at sea but I found my way to land and am back in life as a human. For the unjust treatment and enslavement I demand payment of the damage as follows:

1. 2 Billion Swiss franc paid to a Swiss bank account CHF 2'000'000'000 - two, zero, zero, zero, zero, zero, zero, zero, zero or in US dollars 2. 50 Kg Gold 999.9% Delivery by secure courier 3. 50 Kg Silver 999.0% Delivery by secure courier

The payment period is 30 days from November 22nd, 2020. Please transfer the amount to the following

bank account:
acrevis Bank (Headquarters in St.Gallen is a commercial bank) Poststrasse 4 9200 Gossau Switzerland BC: 06900 BIC/Swift: ACRGCH22
Antonio Ramunno IBAN:
Please use the following address for delivery of the precious metals:
Antonio Ramunno
I am at your disposal at the following e-mail address: [mailto
Sincerely
without prejudice UCC 1-308 Antonio Ramunno
Antonio Ramunno

From: Gurl B

To: Office of Secretary@FRB.GOV

Date: 12/3/2020 7:18:37 PM Subject: LISCC Program

# NONCONFIDENTIAL // EXTERNAL

I AM CURRENTLY BEING HELD HOSTAGE BY DOCTORS WITHOUT BORDERS WHO IS TRYING TO FORCE ME INTO AN ADOPTION TO AN ILLEGAL IMMIGRANT WHO THINKS IF HE CAN STEAL MY IDENTITY AND FORCE MUNCHAUSEN BY PROXY ON ME THAT IT WILL GRANT HIM CITIZENSHIP AND ENTITLE HIM TO HARVEST MY EGGS. PLEASE STOP FUNDING CHARITIES THAT ENGAGE IN HUMAN TRAFFICKING THEY ARE ABUSIVE THIS ONE KIDNAP ME WHEN I WAS FOUR AND MURDERD MY GRANDPARENTS AND STOLE THIER IDENTITIES TO COMMIT GUARDIANSHIP FRAUD OF MY FAMILY. THIS HAS BEEN GOING ON FOR THIRTY YEARS.

PLEASE CUT JANE FONDA OFF OF HER VETERANS AFFAIRS SUBSIDIES SHE USES THEM TO MUTILATE CHILDREN LIKE SHE DID ME MY WHOLE LIFE AND PROBABLY SELLS THIER BODY PARTS TO ILLEGAL IMMIGRANTS WHO PROBABLY EAT THEM.

I DONT WANT THE MILITARY IN TROUBLE FOR NOT BEING ABLE TO KEEP TABS ON THIER AWOLERS LIKE JANE FONDA. SHE NEEDS TO BE DEALT WITH SO THE MILITARY CAN SEE HER BEHAVIOR ON RECORD

From: Mr Trinh Pham

To: Office of Secretary@FRB.GOV

Date: 12/4/2020 6:53:29 PM

Subject: LISCC Program

NONCONFIDENTIAL // EXTERNAL

For the member of ss: funding to du good a bank: for all withheld currency or more info on other steps and cause

Sent from my iPhonek

From: "Albert Picquet (AP)"

To: Office of Secretary@FRB.GOV Date: 12/6/2020 10:18:55 PM Subject: LISCC PROGRAM

# NONCONFIDENTIAL // EXTERNAL

How can I legally own every dollar I make? Every Legal American Tender & Coin?

From: Victor Manuel Esperanza romero
To: Office of Secretary@FRB.GOV
Date: 12/10/2020 4:05:06 PM

Subject: LISCC Program

# NONCONFIDENTIAL // EXTERNAL

Hello, good afternoon, by this means, I am communicating with you to ask for help since a group of public and social workers are discriminating against me.

It is very difficult for me to explain the problem but it is rooted in reasons of extinction and fraud against me or perhaps it is a matter of the workers not paying attention to the abuse they commit by not paying attention at work what They perform.

I see it very unfair to be without work, without a driver's license, without residing unemployment, attacked by The same systems that are supposed to help poor people and that misunderstandings make life impossible for them.

From: SAAD RAMADHAN MUHI
To: Office of Secretary@FRB.GOV
Date: 12/11/2020 4:18:04 PM

Subject: LISCC Program

### NONCONFIDENTIAL // EXTERNAL

My Name:(SAAD RAMADHAN MUHI)FROM(IRAQ Al Tamim)Bron: ...I want to go to the United States of America\_I am a Client with CIA-IP-U.S Army Armyic FORCES MILITARY in Captain in S.W.A.T And Business And Language IRAQ/Salahuddin/Tikrit(2003,2004,2005) I came from Iraq to Turkey\_Befor" 6 years and Six months ago\_UN\_Phosphorus/Agree/United States of America-On: 15/6/2015 but I did not receive it I have a Human rights in Istanbul, Turkey And Federal American Human rights in Istanbul, Turkey\_And She send me to go to Hospital in Istanbul (For Second time in Resonance 30 minutes Complete the Surgery Operation Skull 40%, eye left 20%) And I've been Very Memory And She Call me to go"Consult Psychological in Refugees in Istanbul And He give me The Phosphorus\_UN\_On: 31/8/2015\_\_After 75 days\_He Stolen my Profile Person UN\_\_Why?After that I quoted from Refugees in Istanbul To Karaman in Turkey-On: 20/11/2015 | Stayed Sick infected body and abdomen for"4 years and five months" I asked Dr. Hospital in Karaman to move me with my Mother in Sakarya, Turkey\_On: 6/3/2019\_And I am alone here in Sakarya, Turkey Now\_This is my Phone: \_And my Email address:( Swipe Up \_( ICMC \_ UN In لى الخاص Galaxy من الإرسال تم

From: SAAD RAMADHAN MUHI
To: Office of Secretary@FRB.GOV
Date: 12/11/2020 6:08:50 PM

Subject: LISCC Program

### NONCONFIDENTIAL // EXTERNAL

Thank you. My Name:(SAAD RAMADHAN MUHI)FROM(IRAQ\_Al Tamim)Bron: ...I want to go to the United States of America\_I am a Client with CIA-IP-U.S Army Armyic FORCES MILITARY in Captain in S.W.A.T\_And Business\_And Language\_IRAQ/Salahuddin/Tikrit(2003,2004,2005) I came from Iraq to Turkey\_Befor" 6 years and Six months ago\_UN\_Phosphorus/Agree/United States of America-On:15/6/2015\_but I did not receive it\_I have a Human rights in Istanbul,Turkey\_And Federal American Human rights in Istanbul,Turkey\_And She send me to go to Hospital in Istanbul(For Second time in Resonance 30 minutes Complete the Surgery Operation Skull 40%,eye left 20%)And I've been Very Memory\_And She Call me to go"Consult Psychological in Refugees in Istanbul\_And He give me The Phosphorus\_UN\_On: 31/8/2015\_\_After 75 days\_He Stolen my Profile Person UN\_\_Why?After that I quoted from Refugees in Istanbul To Karaman in Turkey-On: 20/11/2015\_I Stayed Sick infected body and abdomen for"4 years and five months" I asked Dr. Hospital in Karaman to move me with my Mother in Sakarya,Turkey\_On: 6/3/2019\_And I am alone here in Sakarya,Turkey Now\_This is my Phone:

بي الخاص Galaxy من الإرسال تم Swipe Up

From: Hawko Abubakir

To: Office of Secretary@FRB.GOV Date: 12/12/2020 7:23:52 PM Subject: LISCC Program

# NONCONFIDENTIAL // EXTERNAL

Hello sir I hope you are doing well and safe

I have one million dollars bill, which is very old

If you get it or buy it send the message for my email

From: Las Casas Advogados Associados [lascasasadvogados@gmail.com]

To: Office of Secretary@FRB.GOV Date: 12/16/2020 11:03:28 AM

Subject: Programa LISCC

NONCONFIDENTIAL // EXTERNAL

Dear Federal Reserve System,

The 3a. Family and Succession Court of Jundia, S o Paulo, Brazil, requests your lordship financial information about Mr. Daniel Shammass Morel and an Offshore of its ownership, to be provided within the process

no which runs in secret of justice.

The information should be forwarded directly to Judge Dr. Grakiton Satiro Arag o via email jundiai3fam@tjsp.jus.br

Follows the Court order

Carefully

Maria Fernanda C sar Las Casas de Oliveira - Lawyer n

- OAB/S