

## ILCs 101

For over a century, ILCs have provided reliable and safe financial services to consumers and businesses. They follow the rules of traditional banks and have shown a unique ability to be innovative and perform well.

### QUICK FACTS:

- Started in **1910** by Arthur J. Morris.
- Serve a **wide range** of individuals and industries.
- Weathered the great depression & **recent financial crisis** well.

*More info on "Industrial Banks 101: Who They Serve"*

## STRENGTH & STABILITY

ILCs have been at the forefront of banking innovation while operating within the traditional rules of banking and have managed to outperform all other FDIC insured institutions.

### QUICK FACTS:

- ILCs enjoy a **4.5 - 10.5%** better avg **Return on Equity** than non-ILCs.
- ILCs are a full percentage higher on avg **Return on Assets** than non-ILCs.
- ILCs are subject to **traditional banking regulations**.

*More info on "Industrial Banks: A History of Stability & Strength"*

## BROKERED DEPOSITS

The FDIC should review the exclusion of all fully-insured brokered deposits from the definition of the term "core deposit" used in the Uniform Bank Performance Report.

### QUICK FACTS:

- The definition of a "core" deposit is **not in the regulation**.
- Brokered deposits are proven to be **very stable** in bad economic times.

*More info on "FDIC: It's Time to Update the Definition of Brokered Deposits"*

## THE BARTH CIBFS REPORT

James R. Barth of Auburn University conducted a study for CIBFS on how ILCs have performed compared to other FDIC insured institutions. ILCs perform better than all other FDIC institutions.

### QUICK FACTS:

- ILCs have **outpaced non-ILCs for 15 years** in key performance indicators.
- ILCs **actually grew** during the recent financial crisis.

*"Industrial Bank Performance: A Summary of the Barth CIBFS Report"*

## THE VOLCKER RULE

The Volcker Rule imposes rules on ILCs that result in unnecessary regulatory burdens, restricts business growth, and slows down investment. It is inapt for ILCs.

### QUICK FACTS:

- Doesn't account for **differences** with Wall Street banks.
- ABA estimates it will take **6,600,000 hours of work** to implement the law

*More info "The Volcker Rule & Industrial Companies: Unnecessary Harmful Consequences"*

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