

BOARD OF GOVERNORS  
OF THE  
FEDERAL RESERVE SYSTEM

# Office Correspondence

Date January 8, 1938.

To Chairman Eccles

Subject: Bank Holding Companies

From Messrs. Blattner, Cagle, Wingfield

**CONFIDENTIAL**

Pursuant to your request, there is attached a memorandum relating to bank holding companies. This memorandum covers, in the following order —

Congressional policy;  
Difficulties of dissolution;  
Some advantages of group banking;  
Principal weaknesses in regulatory statutes;  
Possible changes to strengthen statutes;  
Certain additional data on bank holding companies.

The possible changes in the regulatory statutes have been indicated on the basis of the understanding reached at our discussion on January 5. On one or two points which were not specifically covered or on which there is some doubt, possible alternative solutions have been indicated in footnotes in the attached memorandum. When you have considered the questions on these points, such changes may be made as considered desirable.

Respectfully,

*G. W. Blattner*  
G. W. Blattner

*C. E. Cagle*  
C. E. Cagle

*B. Magruder Wingfield*  
B. Magruder Wingfield

Attachment