San Francisco, California November 6, 1939.

Honorable Preston Delano, Comptroller of the Currency, Treasury Department, Washington, D. C.

Dear Comptroller Delano:

We have just received completed appraisals from the American Appraisal Company of the 123 properties occupied as banking premises by Bank of America, on which the Bank Examiner arbitrarily estimated a huge loss in his report of examination commenced March 31, 1939, and the values of which had not been previously questioned.

These appraisals show a total plant value, after full allowance for depreciation, of \$37,829,092, which is over \$1,600,000 in excess of the amount at which the properties were carried on the books of the Bank on December 31, 1938, namely \$36,209,282.

Tou might be interested in knowing that the report shows the reproduction value of this plant as \$45,084,544., the land being valued at present low market. Since these appraisals cover only properties which were criticized by the Examiner, we confidently expect that when the appraisals are completed for the remainder of the plant the excess of value of the total plant over carry value will be proportionately greater.

A full tabulation of the appreisals now on head is being made, and I contemplate taking it with no when I leave for machington shortly.

Sincerely yours,

(Signed) A. P. Giannini

Chairman of the Board.