II. borrespondence

July 23, 1965

Mrs. Virginia Self Oklahoma Bankers Association 611 Colcord Building Oklahoma City, Oklahoma 73102

Dear Mrs. Self:

I greatly appreciate your prompt response to my request for a copy of the address by Eugene P. Gum.

Thank you very much for the copy as it is a valuable document, and will be useful in completing my research on the history of deposit guaranty.

Sincerely yours,

Clark Warburton, Chief Banking and Business Section Division of Research and Statistics Mr. Joe T. Gilliland Executive Secretary Oklahoma Banker's Association 611 Colcord Building Oklahoma City 2, Oklahoma

Dear Mr. Gilliland:

Nearly ten years ago, in a letter dated September 21, 1955, your predecessor, Mr. Charles L. Fuson, wrote to Mr. Edison H. Cramer, then Chief of this Division, that his office had a copy of an address by Eugene P. Gum, former Secretary of the Oklahoma Bankers Association, which had been delivered before the Colorado Bankers Association on June 20, 1924, and was entitled, "How the Bank Guaranty Law Failed in the State of Oklahoma". Mr. Fuson offered to make the copy available to us, but we did not request him to do so, because of my pending trip to Oklahoma and other States to collect information regarding their deposit guaranty systems.

When I visited Oklahoma in December 1955 and made an appointment to talk with Mr. Gum he indicated that he would give me a copy of this speech, which had been printed as a pamphlet, but when I saw him (just before I left Oklahoma City) he was unable to locate the copy. The next year, when I was preparing my report on the Oklahoma deposit guaranty fund I did not write to Mr. Fuson to inform him that I had not obtained a copy from Mr. Gum, though I have a note in my records that I should do this.

I am now writing to you to ask whether, after this lapse time, there is still a copy of Mr. Gum's address in the files of the Oklahoma Bankers Association, and if so, if you could make if available to me. I will be glad to renumerate you for the cost of securing a xerox or photostat copy; or if you should wish to loan it to me, I will have a xerox copy made here and return your copy to you.

My reports on the State deposit guaranty funds are in manuscript, never having been published, though a summary of the results was included in the 1956 annual report of the Federal Deposit Insurance Corporation, pages 47-73. But I am still interested in making a few revisions in my manuscript, to place it in final form for publication, and therefore would like to obtain a copy of Mr. Gum's address, if it is still available.

Thanking you for your cooperation, I am

Sincerely yours,

Clark Warburton, Chief Banking and Business Section Division of Research and Statistics January 26, 1956

Mr. Charles L. Fuson, Executive Secretary Oklahoma Bankers Association 1106 Colcord Building 15 N. Robinson St. Oklahoma City, Oklahoma

Dear Mr. Fuson:

Mr. Clark Warburton has returned from his trip to several States that formerly had deposit guaranty systems in operation. He has told me about the material that he obtained from your office. On behalf of the Corporation, I want to thank you for your splendid cooperation in making it possible for him to obtain so much information about the Oklahoma fund.

Very truly yours,

Edison H. Cramer, Chief Division of Research and Statistics January 26, 1956

Mr. O. B. Mothersead Bank Commissioner Oklahoma State Banking Department Oklahoma City, Oklahoma

Dear Mr. Mothersead:

Mr. Clark Warburton has returned from his trip to several States that formerly had deposit guaranty systems in operation. He has told me about the material that he obtained from your office. On behalf of the Corporation, I want to thank you and Mr. Kelly for your splendid cooperation in making it possible for him to obtain so much information about the Oklahoma fund.

Very truly yours,

Edison H. Cramer, Chief Division of Research and Statistics MEMORANDUM

TO: Dr. Cramer

FROM: Clark Warburton

SUBJECT: Report of work for week ended December 23

Reports of work of the staff of the Banking and Business Section are attached. Annual leave - Miss Morton - 12/21-12/23; Miss Thompson - 12/23.

From Oklahoma City, Oklahoma

Saturday afternoon, December 17, wrote to the Deputy Bank Commissioner, Texas, that I was remaining in Oklahoma City longer than I had anticipated, and now expect to be in Austin the first week in January. Also, wrote to the FDIC Supervisory Examiners in Kansas City and Dallas, referring to Mr. Sailor's memorandum, and stating that it had not been possible to make stops in their respective cities.

Monday, Tuesday, Wednesday, and five hours on Thursday were spent at the office of the Bank Commissioner examining records of the State Banking Board for the period of operation of the deposit guaranty fund. The materials used included minutes of the State Banking Board for the entire period; warrant register showing warrants on the guaranty fund issued, paid, and outstanding; liquidation register showing the record of three banks closed about 1910; an untitled volume containing statements as of date of failure for most of the banks that failed while the fund was in operation, and results of liquidation up to a date about the mid-1920's; and an inventory of property of the fund (cash and assets of failed banks) in 1930 prepared in connection with the litigation regarding closing of the fund. Data taken off from these sources include three sets of figures for the expenditures of the fund in the respective failed banks; two sets of figures for the recoveries of the fund; deposits in each failed bank by type (to be added to obtain total deposits) at date of failure; and guaranty fund warrants issued, paid or cancelled, and outstanding by quarters from the latter part of 1911 to the close of the fund. Materials examined but not used included various ledgers and cash books of the fund, dealing with individual transactions. Use of these books to obtain annual statements of receipts and disbursements of the fund might conceivably have been possible, but did not appear to be practicable.

Three hours on Thursday and all day Friday - on compensatory leave for time spent on Sunday, November 27, in reviewing the Nebraska report and on Sunday, December 4, in reviewing the Kansas report, and materials collected in connection with those reports. See first and second paragraphs of report of work for week ended December 9. (Compensatory leave subject to approval).

December 20, 1955

MEMORANDUM

TO:

Dr. Cramer

FROM:

Clark Warburton

SUBJECT: Report of work for week ended December 16

Reports of work of the staff of the Banking and Business Section are attached. Sick leave - Mrs. Shea, Dec. 12-14.

Economic developments and banking history

Continued all week to work at Oklahoma City on material regarding the deposit guaranty fund in that State. In addition to reviewing banking journals not available in Washington, nor located where they could be obtained on interlibrary loan, it is necessary to transcribe data from court records and records of the State Banking Board. For the most part, such data relate to individual banks, and have not been assembled in convenient summary form as were those regarding payments to depositors in Nebraska and Kansas. Will continue to work here at least half of next week. Will not visit Austin, Texas, therefore, until after taking a few days' annual leave at Christmas; and it is possible that it will be desirable to return here for a few additional days also.

On Saturday and Sunday, Dec. 10-11, reviewed the Oklahoma Banker for 1920-25, the Bank Deposit Guarantee Journal, 1914-1918, and The State Banker, 1914-1918, taking notes. Also began to take off statements of receipts and disbursements of the guaranty fund, and of warrants outstanding and issued and retired. Most of these were quarterly statements, originally published by the Treasurer of the State Banking Board. However, quite a few of the statements were not located in the journals, in part because of issues not in the files borrowed from the Oklahoma Bankers Association.

Monday, Tuesday, and Wednesday were spent on the District Court and Supreme Court records of the court cases regarding final disposition of the fund after the law was repealed in 1923. These provided much information regarding the indebtedness of the fund, as indicated by claims proved, at the time of repeal—or rather, a few years later after most of the failed banks had been liquidated—and regarding the holders of the claims (i.e., whether banks or depositors). Also, they gave considerable information about the way the fund was handled toward the end, for which we had previously very little information, particularly with respect to issuance of warrants and substitution of these for the securities that the banks had been required to deposit as collateral for payment of assessments levied against them.

Evenings and on Thursday I completed taking off the statements of the fund as published in banking journals, and reviewed and made notes on the proceedings of the conventions of the Oklahoma Bankers Association for 1907-16, which the secretary of the Association had also loaned me. All the journals and proceedings borrowed were returned. In the morning I talked with Mr. Mothersead again. He had indicated that an assistant would know about

records of the Department, which were stored in the Capitol attic. (However, he had wanted me to examine the court records first). The man who knew about the records, he told me Thursday, was one of the bank examiners who would not be in until Saturday morning. Also on Thursday, visited the State Library at the Capitol, where Mr. Hudson, the librarian had an assistant see what he could find. He located seven issues of the Biennial Report of the Bank Commissioner, covering the period from 1907 to 1920 (all that were issued); and the First Annual Report of the State Banking Board, which I had not previously seen. Checked some data I had taken from the Commissioner's reports years ago (when we borrowed them from the Library of Congress), and took off some data from the report of the State Banking Board. Thursday afternoon I talked with Mr. Eugene P. Gum, former secretary of the Oklahoma Bankers Association, now retired, at the suggestion of the present secretary. However, he did not add much to the information I already had. Called at the Oklahoma City University, but did not find any material in the library, and was not able to see the professor in charge of money and banking. There is no graduate work at this university.

Friday was spent at the University of Oklahoma, at Norman, about twenty miles from Oklahoma City. Talked first with Prof. James M. Murphy, who teaches some of the courses in money and banking. He was interested, and promised to inquire of Prof. O. J. Sollenberger, an older professor in charge of the work in money and banking (whom I was not able to see) whether he might have in his files any issues of the Bank Deposit Guarantee Journal or The State Banker or other pamphlet material regarding the fund. Talked with Mr. James M. Babcock, the assistant archivist, who spent considerable time looking through materials from files of former Governors and others who were interested in the guaranty plan, to see if any of these journals or pamphlets might be located. None were found, but Mr. Babcock introduced me to Prof. W. N. Peach, who has been working on a history of banking in Texas. Prof. Peach, who is not now working on this study though it is not completed, said he had obtained considerable material on the guaranty fund from the records of the State Banking Department (obviously before they were destroyed, which he did not know about). He offered and agreed to go through his files and send to me in Washington all the material he has regarding the guaranty fund. This may be of great value in the Texas study. At the University I also checked at the library for the banking journals, finding none that I had not previously seen, and for other material regarding deposit guaranty. Found one M.A. thesis in 1926 which had some useful material, on which I took notes and quotations.

Saturday morning was spent at the State Banking Department. Met Mr. C. R. Donart, Assistant Bank Commissioner, and Mr. E. H. Kelly. Mr. Kelly immediately brought out the third volume of the minutes of the State Banking Board, covering the period from May 1919 to near the time of repeal of the law. Worked from this volume until the office closed at about 11:30. Found data regarding the handling of banks in 1920, including expenditures from the fund. This was information not published in the reports of the Commissioner, and which we had not previously found elsewhere. Will continue to work with this volume of minutes on Monday. In addition to this volume of minutes, Mr. Kelly also brought down from the attic several other volumes of records relating to the fund, and showed me where additional volumes are located in the attic. How many of these will prove to have information that is useful and can be obtained in a reasonable length of time I will not know until I examine them next week.

PRESIDENT THOMAS D. TARPLEY, MUSKOGEE OKLAHOMA BANKERS ASSOCIATION 1106 COLCORD BUILDING TELEPHONE FO 5-5608 VICE-PRESIDENT EXECUTIVE-SECRETARY K.G. BRALEY, CHEROKEE CHARLES L.FUSON, OKLAHOMA CITY OKLAHOMA CITY TREASURER September 21, 1955 ASSISTANT-SECRETARY ARTHUR M. FOSTER, BRISTOW MARY CHAPMAN, OKLAHOMA CITY Mr. Edison H. Cramer, Chief Division of Research and Statistics Federal Deposit Insurance Corporation Washington 25, D. C. Dear Mr. Cramer: I am sorry that my being out of town has delayed my replying to your letter of August 12, inquiring as to whether or not the Oklahoma Banker was being published between 1908 and 1921. Bound copies of the Oklahoma Banker from 1909 to 1921 are on file in this office. To my knowledge, our copy is the only one in existance. You advise that your division is making a study of the history of the deposit guaranty in Oklahoma. For your information, we have in our office one copy of an address by Eugene P. Gum. former secretary of the Oklahoma Bankers Association, delivered before the Colorado Bankers Association on June 20, 1924 entitled "How the Bank Guaranty Law Failed in the State of Oklahoma". We could make the copy of this speech available to you. I would also suggest that additional information on this subject might be obtained from the book "The Guaranty of Bank Deposits" by Thomas Bruce Robb, associate professor of economics, University of Missouri, published in 1921 by Haughton Mifflin Company -- The Riverside Press, Cambridge. This book contains a chapter on the Oklahoma system. This book is available at the library of this Association. If we may assist you further, please do not hesitate to ask. Very truly yours, Charles L Fuson Executive Secretary clf/vrb igitized for FRASER tps://fraser.stlouisfed.org

C.R. Donart asst. Benk Commosioner

November 7, 1955

Mr. O. B. Mothersead Banking Commissioner Oklahoma State Banking Department Oklahoma City, Oklahoma

Dear Mr. Mothersead:

Soon after the beginning of Federal deposit insurance, we began to collect information on the experience of various States with deposit guaranty. Our studies of these State systems were not brought to completion at that time. They have recently been resumed, and we are now preparing reports on each of them which we plan to complete for publication.

In the case of Oklahoma, a report prepared by Clark Warburton, of our staff, was mimeographed and given a limited distribution. A copy of this report is enclosed. Subsequent to its preparation, we were able to borrow a copy of the thesis for the Graduate School of Banking by Mr. Linwood O. Neal, then Bank Commissioner, "The History and Development of State Bank Supervision in Oklahoma," which provides some information not available to us when our report was prepared.

However, there is still some information which we would like to obtain, if possible, before making our final revision of the report for publication. The material which we are particularly anxious to check and revise is the annual data in Table 9, page 41, of our report. We are therefore writing to ask whether records of the guaranty fund and of the results of liquidation of the failed banks which we presume may now be in archives or storage, would be available for the use of a member of our staff? Mr. Warburton is expecting to be in Oklahoma City during the early part of December, and if useful material is available, would like to spend a day or a few days amplifying and correcting our worksheets dealing with this material.

We shall be very grateful to you for any material that can be made available, and also for any criticisms or other comments on the report as mimeographed.

Very truly yours,

Edison H. Cramer, Chief Division of Research and Statistics

August 12, 1955

Mr. Charles L. Fuson, Executive Secretary Oklahoma Bankers' Association 1106 Colcord Building Oklahoma City, Oklahoma

Dear Mr. Fuson:

This Division is making a study of the history of deposit guaranty in Oklahoma, 1908-1921, and we would like to examine the Oklahoma Banker for material pertaining to the deposit guaranty experience of this State.

Was the Oklahoma Banker being published during the above mentioned period, and if so could you tell us where a file might be available?

Very truly yours,

Edison H. Cremer, Chief Division of Research and Statistics

September 22, 1939

Mr. Linwood O. Neal, Bank Commissioner, Oklahoma City, Oklahoma.

Dear Mr. Neal:

Five years ago this Division collected some material relating to guaranty of bank deposits in various States prior to the creation of the Federal Deposit Insurance Corporation. It was impossible to complete our study at that time and we are now attempting to obtain further information regarding the various State funds.

We find that our information regarding the operation of the guaranty fund in Oklahoma is scanty. Would it be possible for you to furnish us with the material described below? We shall be glad to reimburse you for any clerical or stenographic expense incurred in compiling the material or having copies made if this should be necessary.

- 1. Quarterly or annual statements of the cash account and warrant account of the fund, similar to those for the quarters December 31, 1914, December 31, 1916, and December 31, 1918, given in the Fourth, Fifth, and Sixth Biennial Reports of the Bank Commissioner.
- 2. A list of the banks which failed during the period of operation of the fund showing for each bank its deposits at date of failure, amount paid out by the guaranty fund, amount recovered from liquidation of the assets of the bank, and the net cost to the guaranty fund.
- 3. The proceedings and decision of the State Supreme Court on September 11, 1934, regarding disposition of the remaining assets of the fund, and statements regarding the fund prepared for the use of the Supreme Court in connection with the case.

Very truly yours,

Donald S. Thompson, Chief Division of Research and Statistics

VExamine court regions.

October 14, 1939

Mr. E. M. Brooks, Bank Commissioner, Topeka, Kansas.

Dear Mr. Brooks:

Five years ago this Division collected some material relating to guaranty of bank deposits in various States prior to the creation of the Federal Deposit Insurance Corporation. It was impossible to complete our study at that time and we are now attempting to obtain further information regarding the various State funds.

Your office supplied us with information regarding the final results of the operation of the guaranty fund in Kansas, and we have obtained a record of the annual receipts and disbursements of the fund from the reports of the Treasurer of State. We would like, however, to obtain the information described below which we do not have. We shall be glad to supply clerical or stenographic assistance or reimburse you for expenses incurred in compiling the material or having copies made.

The information which we desire is a table showing the location and name of each guaranteed bank which failed together with the following data for each bank:

- a. Total deposits at date of failure;
- b. Guaranteed deposits (that is, certificates issued);
- c. Dividends paid by bank on certificates issued;
- d. Certificates paid from the guaranty fund;
- e. Losses to depositors (that is, certificates never paid).

Very truly yours,

Donald S. Thompson, Chief Division of Research and Statistics

October 21, 1934.

OKLAHOMA INTERVIEW

Mr. Fred J. Paro, Vice President, Mercantile Commerce Bank and Trust Company, St. Louis, Missouri.

Mr. Paro as an officer in a St Louis bank with many correspondent banks in neighboring states has attended many state Bankers' Association meetings. When questioned concerning the attitude of bankers in the states with guaranty of bank deposit laws, he stated that he had had a part in the events leading to repeal in Oklahoma.

He was in a state meeting in Oklahoma when the question was put to the meeting as to whether or not the bankers should favor a repeal of the guaranty law. The vote was a tie. Mr. Paro was called upon to express an opinion on the subject as a disinterested onlooker. He said that while the vote showed an even division of opinion he was sure that deep in their hearts all the bankers present, including the little red-headed fellow who had been arguing most emphatically for the retention of the law, were desiring its repeal. The vote was then taken again and the motion passed with only the little red-headed man dissenting.

OKLAHOMA INTERVIEW

Mr. S. A. Bryant, President of the Oklahoma Bankers' Ass'n, Farmers' National Bank, Cushing, Oklahoma.

In this interview it was evident that as a National banker Mr. Bryant had not taken a keen interest in the state bank guaranty of deposits in Oklahoma. He attributed the break-down of the plan in Oklahoma to the promisculous granting of charters. Banks were established where there was no economic need for a bank, and men assumed control of these institutions who were not prepared to assume the responsibility of conducting a legitimate banking business. There were many promoters who were controlling officers in banks. An example of this was to be seen in the large business built up by Mr. Norton, (for further discussion of this case see "Robb Guaranty of Bank Deposits).

Following the passing of the guaranty law there were changes among the banks from national to state charter in order to be able to state that deposits were guaranteed. The movement did not originate with the bankers, but was a political devise of Governor Haskell. Many of the bankers were antagonistic in the beginning, but not all of them. There was no definite attempt to prevent the passage of the law.

At the same time that this law was passed a law was also put on the books compelling state banks to keep their reserve deposits in state guaranteed banks.

Mr. Bryant was not opposed to the present Federal Deposit Insurance but said, "Be sure to keep the provision that all banks shall become members of the Federal Reserve System".

The conversation turned from the subject of guaranty of deposits. Mr. Bryant said that women made bad bank customers; that they did not feel any responsibility toward the bank and withdrew their funds whenever there was a rummer that a bank might be in difficulty. He said that men hesitated to do this, but admitted that some of them sent their wives to withdraw their joint accounts.

OKLAHOMA STATE BANKING DEPARTMENT

Howard C. Johnson, Bank Commissioner

Oklahoma City

March 7, 1935.

Mr. Mortimer J. Fox, Jr., Chief, Division of Research and Statistics, Federal Deposit Insurance Corporation, Washington, D. C.

Dear Mr. Fox:

I regret that I have not heretofore furnished you the information referred to in your letter of March 4th. This office has been so extremely busy since January 1st that I have not had an opportunity to assemble the information you desire. I will get this compiled and mailed to you early next week.

Yours very truly,

(s) M. B. Cope

M. B. COPE, ATTORNEY

MBC: DW

January 7, 1985

Mr. M. B. Cope, Chief Counsel, Oklahoma State Banking Department, Oklahoma City, Oklahoma.

Dear Mr. Copes

A letter from Mr. W. J. Barnett, Bank Commissioner of Oklahoma, states that he has referred to you our inquiry concerning the final settlement of the guaranty of bank deposit fund in Oklahoma.

Some of the other States which have had guaranty of bank deposits have been willing to lend to us their records of the legal decisions which finally closed the Guaranty Fund.

Enclosed find a sailing frank, which would cover postage on any material which you might be able to furnish us. We would return the same to you very promptly.

We will appreciate very much such assistance as you are willing to give us in obtaining information about the whole experience of the Guaranty Fund in Oklahoma.

Very truly yours,

(Signed) M. J. Fox, Jr. Mortimer J. Fox, Jr., Chief Statistician.

Enclosure.

February 6, 1935

Mr. M. B. Cope, Chief Counsel, Oklahoma State Banking Department, Oklahoma City, Oklahoma.

Dear Mr. Copet

On January 7 we wrote to you concerning the decision in regard to the closing of the bank depositors guaranty fund in Oklahosa.

You will find enclosed a copy of that letter, which may have gone astray.

Very truly yours,

(Signed) M. J. Fox, Jr.

Mortiner J. Fox, Jr., Chief Statistician.

Enclosure.

March 4, 1935.

Mr. M. B. Cope, Chief Counsel, Oklahoma State Banking Department, Oklahoma City, Oklahoma.

Dear Mr. Cope:

The Division of Research and Statistics of the Federal Deposit Insurance Corporation is making a study of bank depositors' guaranty funds. We were referred to you by Mr. W. J. Barnett, Bank Commissioner, of Oklahoma, for information concerning the recent decision in regard to the closing of the Bank Depositors' Guaranty Fund in Oklahoma.

On January 7 and again on February 6, we wrote to you enclosing a mailing frank. We would like very much to hear from you as to whether or not it will be possible for you to supply us with the information requested.

> Very truly yours, (Signed) M. J. Fox, Jr.

Mortimer J. Fox, Jr., Chief, Division of Research and Statistics.

December 20, 1984

Er. W. J. Barnett, State Bank Commissioner, Capitol Building, Oklahoma City, Oklahoma.

Dear Mr. Barnetts

The Statistical Division of the Federal Deposit Insurance Corporation is making a study of the plans for the guaranty of bank deposits which were developed in eight states. We noted in the American Banker of October 25, 1934 that a court ruling had been made to close the fund in Oklahoma.

It seemed probable that in connection with that case you prepared a summary of total receipts and disbursements during the entire period of the guaranty of deposits experiment and of present assets and outstanding liabilities. If so we would like very much to have a copy of your summary.

If it is readily available from your records will you also state the total amount of the deposits in banks which failed while the guaranty law was in force and of the amount of depositors claims which was not from the liquidation of the closed banks.

Any information which you may furnish us in regard to the guaranty of bank deposits in Oklahome will be appreciated very much.

Very truly yours,

(Signed) M. J. Fox, Jr.

Mortimer J. Fox, Jr., Chief Statistician.

October 19, 1934

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Mr. Eugene F. Gum, Secretary, Oklahoma Bankers Association, American Bankers Association Convention, Willard Hotel, Washington, D. C.

Dear Mr. Gum: .

In connection with our studies of the banking laws and their operation in the states which have in
the past had deposit insurance or guaranty laws, it would
be of valuable assistance if one of the members of this
Division could have a personal interview with you while
you are in Washington.

Your firsthand knowledge of the situation in Oklahoma would shed light on how the various parts of the law operated.

The offices of the Federal Deposit Insurance Corporation are located in the National Press Building, which is just across the street from the Willard Hotel. Our room number is 433 and our telephone number is District 1240, Extension 112.

We would appreciate your granting us an interview and advising us when and where it may be had.

> Very truly fours, (Signed) M. J. Fox, Jr.

Mortiser J. Fox, Jr., Chief Statistician.

October 29, 1934.

Mr. S. A. Bryant, Fermers National Bank, Cushing Oklahoma

Dear Sr. Bryant;

The information furnished by you in your conversation with us on October 23 will prove of value to us in our study of state guaranty of bank deposits. We appreciate the fact that you took time during a busy convention to come in and talk with us.

In the course of the infermal conversation which followed our discussing of guaranty of bank deposits, the question arose concerning the insurance of certificates of deposit issued to one individual. The inclosed memorandum indicates the assessment which should be paid and the amount of insurance recoverable by one claimant.

We hope that this will ensuer any questions which may have arisen in your mind in regard to this matter.

Yours very truly,

(Signed) M. J. Fox, Jr.

Mortimer J. Fox, Jr., Chief Statisticism.

October 19, 1934

Mr. S. A. Bryant, President, Oklahoma Sankers Association, American Bankers Association Convention, Willard Sotel, Washington, D. C.

Dear Mr. Bryant:

In connection with our studies of the banking laws and their operation in the states which have in
the past had deposit insurance or guaranty laws, it would
be of valuable assistance if one of the members of this
Division could have a personal interview with you while
you are in Washington.

Your firsthand Enowledge of the situation in Oklahoma would shed light on how the various parts of the law operated.

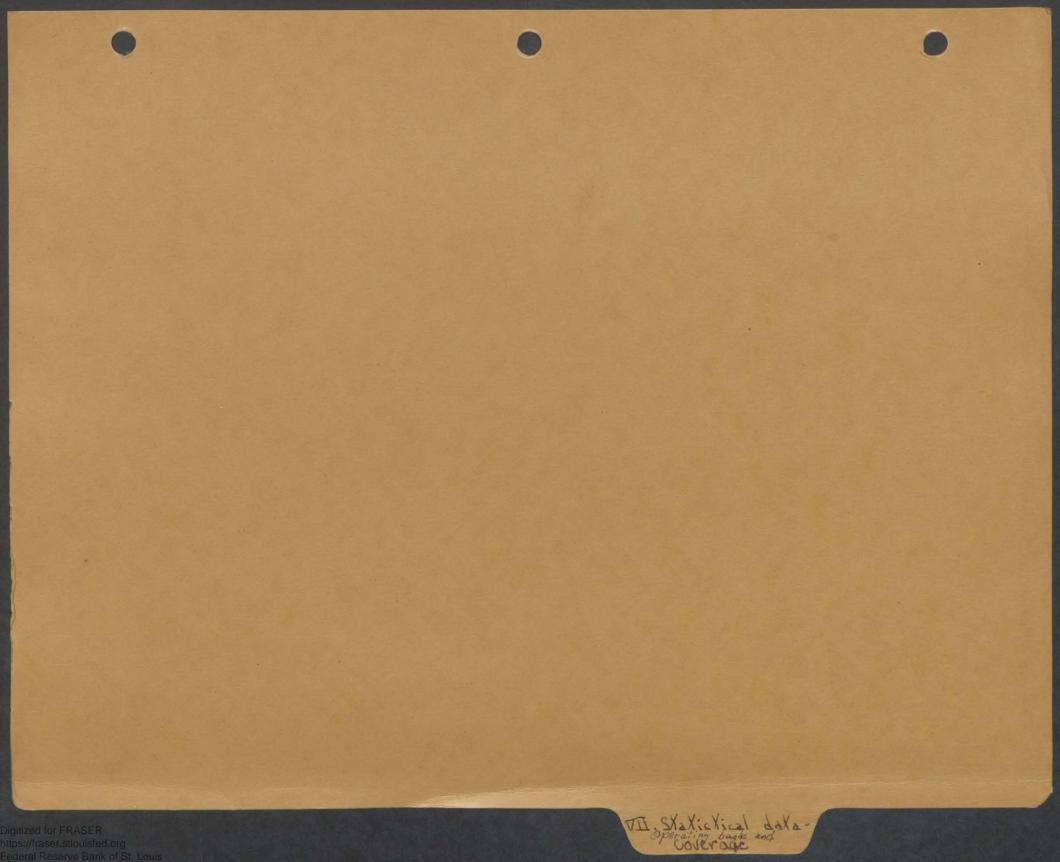
The offices of the Federal Deposit Insurance Corporation are located in the National Press Building, which is just across the street from the Willard Hotel. Our room number is 433 and our telephone number is District 1240, Extension 112.

We would appreciate your granting us an interview and advising us when and where it may be had.

Very truly yours,

(Signed) M. J. Fox. Jr.

Mortimer J. Fox, Jr., Chief Statistician.



FOR WORKSHEETS OF DATA FOR EACH FAILED BANK See file folder

Table 11. NUMBER AND DEPOSITS OF STATE BANKS IN OKLAHOMA, 1908-1920

Banks grouped by amount of deposits

	Sept. 23, 1908	Nov. 10, 1910	Nov. 26, 1912	Dec. 8,	Nov. 17, 1916	Nov. 17,	Dec. 29,
Number of banks - total1/	520	693	617	562	550	582	621
Banks with deposits of - \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	466 41 11	520 133 34	500 91 20	436 102 20	250 231 54	170 293 76	174 268 119
\$500,000 to \$1,000,000 \$1,000,000 to \$2,000,000 \$2,000,000 to \$5,000,000	2	5 1	6	3 1	11 4 1	31 9 3	41 14 5
Deposits - total 1/	£ 26,587	₹ <u>61,612</u>	(Deposits (i	#4,589	\$83,983	\$ 123,594	≥ 158,960
In banks with deposits of - \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	16,136 5,535 3,647	26,590 19,150 11,178	24,063 13,095 6,446	19,987 14,444 6,670	15,627 34,620 17,661	11,937 45,705 25,334	12,053 43,671 40,437
\$500,000 to \$1,000,000 \$1,000,000 to \$2,000,000 \$2,000,000 to \$5,000,000	1,269	3,362 1,332	4,171	2,307	7,33 ⁴ 6,120 2,621	20,824 11,549 8,245	27,512 19,833 15,454

^{1/} Tabulated from statements relating to individual banks, as given in the reports of the Bank Commissioner. Totals differ slightly from the figures given in summary tables for the same dates in the Commissioner's Reports.



COMPOTATION OF XVERREE DEPOSITS IN STATE BANKS IN OKLAHOMA IN 1920, 1921 and 1922 Average leposite for 5 dates computed from Statementa in Seventh Bienniel Report of the Baule Commission of the State 10 blakma, 1919-1920, \$180,778,000 pp. 212-14 150, 993, on 160.0 1921 Deposite 12-29-20 from Jepot of Commission of the 146,789,000 m "1 12-30-21 " Rad McNally Barkers Dueloy 118, 932,000 2 138,765,000 Average of these three figures 118,732,000 Depoils 12-30-21 Jum Rand McNelly Bankers Durettry
6-30-22 " Begant of Comptroller of the Currency 98,369,00 " 12-29-22 " Oklahoma House Journal, Feb. 78, 307,000 91,803,00 Avery of the three Figures Towned arring used until figure for 40,800,000

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NUMBER AND DEPOSITS OF STATE BANKS

(from producent to Form S-16a

talistated from data from Pand Mc Welly's Bampers Directory)

	Number	Deposits
December 31, 1920	617	178,8/6
1921	549	117,690
1922	463	85,756
1923	428	77,719

SIZE GROUPS OF BANKS EXAMINED IN

REPORTS TO

SKLAHOMA BY FISDERAL DEPOSIT INSUMANCE CORPORATION

Depails 1	Number	
4/N, NOR less	20	
9(01,00-8250,000	67	
\$250, No-3-00,00	50	
\$500,000 -8/200,00	15	
4/, 00, 00-82, 00, 00	3	
# 2.00,00-\$5,00,00	7	
Total	158	

Trust congrames were not gracested often Ext. 1911 Number of non-quaranteel thest angeanies Jan 1. 1912 2 3 after 1914 none Notes on trust companies in Oplahoma I modificans with charters + copital of trust Companies were operating. One trust congray was yourd in 1900. Maskogue aklahima Trust Company (organized 9-29-08/ Oklahma City Columbia Bank & Trust Company Tulen Unem Trust Company International Bank & Trust Co, Colonial Trust Co (opened 5-10-10) Vinita Tulsa The Oklahma Tust Congrany, Husbrya, consolidated with alamo State Bank 1-3-10. The Columbia Benk & Trust Corryany Oklahma tity, failed Sept 27, 1909 The Union Trust Congray, Tulea, matinalyis (Exchange Nati Bank) 4-12-11 The Int, Bank & Trust Co. Vinita, changed title + charter 5--2-13 The Colonial Tunt Company consolidated with the Exchange National Bank ; consolidated with the 11-4-14 No other institutions classed as trust companies are mentioned in the Dank Commissioners reports. A few institutions entitled trust companies" or "bank and trust companies" were classed as banks - and presumably had insufficient capital to be daniel as trust companies. ne possible exception - Tulsa; Exchange Trust Co (Sarings Dept) spend 12-15-19

Law proved Dec 17/1907 In effect 7et 14,1908

STATISTICAL DATA REGARDING DEPOSIT GUARANTY FUND IN Oklahoma

I. COVERAGE AND ASSESSMENTS

	Repealer	1. Much 31,	1923		I. COVERAGE AND ASSESSMENTS										
		12510-		6	All bank	s in State	(State reports	Banl	s members of guaranty fund			Assessments			
			ks in State	00	Number Number	Total	Total	Number 1/	Total	Total	Inswed	Deposits	Rate of	Amount of	
A	ear	(Reports C	omptroller o	f Currency)		capital	deposits		capital 4	deposits	deposits	2/ which		c assessments	
		(includ-	. capital	. deposits		accoun			account			assessments	deposits 4	1	
		ing loan	account	(000)		Date						were			
		& trust companies	Oate .	(6.5)								based 3/il			
		O Mile III G 8	ent									of preading grow.			
,	919	Hall	k - 111	01010	1111		19190	m w11/	alula	011001		19993113	1 4/2	199921	
	908	494	May 14	2/2/3	468	12-11-07		170 546	8442	24021		19883663		198836	
	1909	608.	Q-une 30	42203 49304 48,961 42190	546	11-27-08	316175		11911	46336		25097674	195	327388	
	1910	695	June 7	48,961	668	1-31-10		68 694	13622	53 634		44700849		285433	
	1911	636	June 14	35,925	695	1-7-11	61309 6		12884	48391		476/5728		600538	
	9/2		-		633 ×	12-5-11	446246		11 825	40675		53795/63		511054	
	1913	598	June 4	42,153	617 7	11-26-12	46 579 5		11 036			50456/66		201820	
	1914	3-73	^	41,127	583 Y	1-13-14	466315		1074	44140		37021000		148084	_
	1915	557	June 23	43,824	563	12-8-14	44773 5	56 558	10 730	45300		40 45 4322		161 817	
	1916	55-3	June 30	56.081	557	11-10-15	484605	47 559	11112	66924		4498 1828		89 964	
	1917	558	June no	85,038.	547	12-27-16	84799 3	48 567	12040	98222		66677846	20	133356	
	1918	5-79	June 29	108,476	566	11-20-17	137392 50		14 458	121189		10440 0000	,20	208800	
gare 30	1919	582	Tellay 120	122,895	581	12-31-18	120660 5	83 599	16647	153659		115981000	.20	23/962	
7	1920	611	20096	181.037	599	12-31-19	19.09006		20140	180778		150829000	120	301658	
	1921	622		146,789	622	12-29-20	160673								
	1922	486	1 3 5 5 5 n 2	78.369										25000	
	1923	445		70,704	Deports.	I non-gragente	I trust companies								
					10-10-10	11-26-12	123-14							BEEFERS.	
		Vinita : 2	It. Bank + Tx	unt to,	345478	292287	X								
			alonial Trust		168702	408577	100			4 May in	my -11-1	A Line 1	ukenker)	ting and	
THE REAL PROPERTY.			Total		5-14/80	700864			and and	WHIP ALOT	to many o	call all plans	Toley 29	Such Byoth	
THE REAL PROPERTY.		BALL TO								10/13/11	0	9 16566		11111	
			Esterated d	epoils 1 tru	of come			. ,	149		May 4 190	7 B	lar 4.1919	110365	
				3-112-5-11	600.000	1/2	, me in com	yeary de	yand /		3 1 28 Mar		May 12 1919	111784	
				11-26-12	20/000	7/2	sarticipating i	and uniform	trajenting		3000		Ept 12/99	136952	
Fut	intes;	ren	G.	011-13-14		11111	banks	1111	11		Jun 8, 1920		12 17 19/E	158054	
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nttps://fraser.stlou										an	A States			S RESIDENCE OF	

Call dates mount June 30 of each year, Friend agree with those in Gyente A Bank Commissioner. 7) cell date rement Jan. 1 Jeach year (wouldy Dec. 31 of preseling year), Swee; Burnel Beporte of Banks Commission 1) All banks required to join. Trust companies at first required to fire but exempted in 1911, Figures given show smallest and largest numbers reported at call latter during the year.

I Deposts covered; 1908-13, all deposite except U.S. and State Jundo etherwise secured I Deposite covered: 1913-23, deporte not atherwise secured in which rate of interest However, lette regarding amounts exempted by their periseins are not available 3) assessment based on average saily Legents of preceding year (exapt for 1908, which was based on bank examinations made before the law went for 1908, which was basis of special conserved for the secondary the specialist of figures; Theres Bruce Roth, The Secondary of Bank Deposite, p. 74, 4) In addition, assessments of I percent were levied in 1909, 1910 and 1911 one the increase in ciercye diely deposits over the preceding year. The figure shows In 1909 comprises the regular assessment of 5-4 percent and a special assessment of 34 of 1 percent. The annute of degrate in which the various assessments were levited are given balow; 2,914,879 19,603,175-Increase in deports - 170 assessment 5, 514,011

Regular assessment - 15 70 25,097,674 47,615,728 44,700,849 47,615,728 Special 11 (347, in 1909, 17sin 1911) 30, 006, 966 Some: Rott, p. 74. Figure Jon 1911 coverted for obvious arrow and to compan with Grant of Burk Commissioner. 5) Including assessments in in deposits and special assessments as 1911 fallowo! 1909 \$29,148,79 571,388,73 196,031,75 \$ 5-2,140,11 50,195.34 On increase in deposits 89,401,69 Aguler assessment 225,052,23 600,537,52 Special assessment 285,433,44 327,387,68 Smu: Roth, p. 74 (swilledy " vile" light) Deposits of Exchange National Bank 95,231,923 · 3,645,906 Sept 2, 1915 (10 months after abording Colonial Trust)
Sept 12, 1914 2 a print " 1,586,017 Diff - representing deposits I Colonial Tout

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Deposits in Octive Oflakena State Banks during Deposits at the Composition of the Green the Green of the Green the Found of the Class with the Interior of the Green the Community of the Class with the Community of the Co	1			Depositsjie	e gue	we Of	lahowa Tund,	State	Banks duri	ug Ose	ation date		
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193-07 309 43615 1908 Manife 494 21213 494 2 21213 1127-08 288 43.621 1909 april 8 608 42203 60	Dare	Number	Deproto	glai	Munice	1 Deboga	Nurul by	Dadil	Number Don't	nulle	Donalle	IIIII	
127-08 258			(ou ommy)					Storce	The same of the sa	, acomocc	Sypones		
137-08 288 43.62 19 0 9 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	12-3-07	309	43615	1908 May 14	494	21213	494 2	21213					
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1-13-14 330 88,602 [9 14 Fine 16 573 41127 573 41127				1912						2			
12-31-14				1913 June 4						2	3/2	13	14010
12-31-15 346 109,693 1 9 16 12-27-16 428 160,550 1 9 17 June 20 558 85038 558 85038 1 12-31-17 335 244,543 19 18 579 108476 579 108476 579 108476 12-31-18 355 218,338 19 19 582 122875 582 122875 1231-19 345 322,171 19 20 611 181 037 611 21 181 037 12-24-20 355 273,691 19 21 622 146789 622 31 146789 12-31-31 382 247,112 1922 486 78369 486 31 78369 486 31 78369 12-2-2 447 317,963						the same of the sa		A STATE OF THE PARTY OF THE PAR					
12-27-16	The second secon			1916						BHILL			
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12-31-18 355 218,338 1919 582 122875 582 122875 12-31-19 345 322,171 1920 611 181037 611 3 181037 12-41-20 355 273,691 1921 622 146789 622 3 146789 12-31-21 382 247,112 1922 486 78369 486 3 78369 12-12-12-12-12-12-12-12-12-12-12-12-12-1				1918	579			THE RESERVE AND DESCRIPTION OF THE PERSON NAMED IN					
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$							582	122875					
$12-29-20 \ 355 \ 273,691 \ 1921 \ 622 \ 146789 \ 622^2 \ 146789 \ 12-31-21 \ 382 \ 247,1/2 \ 1922 \ 486 \ 78369 \ 486^3 \ 78369 \ 12-22 \ 447 \ 317,963$	12-31-19	345		1920		181 037		181 037					
12-31-21 382 247,1/2 1922 486 78369 4862 78369	12-29-20	355	273,691	1921		146789	21						
	12-31-21	382	247,112	1922	486	78369	486 27	78369 ~					
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	П
DEPOSITS OF NATIONAL BANKS IN OKLAHOMA	2,828 Dec 31. 43
In thousands of dollars	3,366 382 banks
(From reports of Comptroller of the Currency)	OIT 3 3
Qui31,1914 Qui31,1914 Qui31,1914 325,056 Dav 31,1919	103716
20031,1919 305,056 Davides	442
	8 4 7
54.916.938 118,164 9,578	394
6,177,071 12,787 92	1,090
1030116 1166 144327	6,343 3,451
25,000 7,759 18,319	349
4,211,640 929,598 1,233 2,438	6,983 3,730
2,567,569 9,138 2,181	3,730
15,6/80 3,887	2,564
1,065,327 36,248 9,397	21,417
6,780 2,892	232
27,962 11,755	3,597
6,571 7,986 1,533 49	71
1,455	4,416 27,365
331 245,749 22,300	8,791
7.789 -000 1,047	550
1,310 2,44,543 7,128	247,1121
44 4,650 4,272 206	59080029,1922
1212 31 4545 4427	5,908 Dec 29,1922 3,659 156 449 banks
4708 3,926 38,343 21 103,533 6,982	156 491 5,081
9,168 15,055 1,447	129,327
1,189 322,1711	34,412
1096931 925	1,905
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708 55 bit 56	719
708 35 book 107,356 5,322 35 4,439 120,532 16.791 120,532	8,019 4333
7/6 10/040	114
2,7 53 4,098 654 1 1,839 1,031	10,774
6,078 4,459 1,293	19
1,530 12,633 2,065 31,347 920	1,596
6 5,402 8,492	26,649
13,237 1,741 3,208 .	611
218,338 m 6,596	7,436 3,751
180,550 m 5,108 5,564	104
145 958	6,877 38,398
273,691 1,185 20,192	9,760
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NUMBER AND DEPOSITS OF NATIONAL BANKS IN OKLAHOMA, 1908-1928 Barko grouped by amount of deposits areine. 1914 Number of nating banks - total 298 225 346 341 314.4 100.0 With deposits of 8/00, ord or less 115 147 138 66 21 23 98.6 31.4 ₹101,00 € 250,00 84 102 141 141 162 112.7 35.8 \$251,000 To 8500,000 27 35 99 39 118 62 408 58.3 18.5 \$501,000 £ 81,000,000 20 24 44 77 185 26.4 8.4 91,001,000 to 82,000,000 34 51 18.4 5.9 Open \$2,000,00 The with depote backs - total 37945 39613 54091 72 787 119 141 182348 260 078 466003 109429.0 100.0 8/00,000 or less 9459 6769 9335 8566 1547 4722 1555 41953 5993.3 5.5 \$10/1000 to \$350,000 12447 11499 16317 21638 24929 16293 18550,2 17.0 \$251,000 to \$500,00 9244 9648 12219 13 885 20870 32597 39631 138094 19727.7 18.0 9501,000 to \$1,000,000 5847 3194 4793 13577 29096 16092 5/029 123628 17661.1 16.1 Ale 00/1 00 8 82,00,000 3601 6904 10373 15/21 50 729 94179 151570 332477 47496.7 43.4 Oper \$2,00,00 Computation of suspension ratios averaginantes Suspended Mamber, avery Sepat Deports in Vegrata in of spenting sugarded per 100 in greating suspended per 1988-Mar 1923 Banks active banks Bankan 9100 in active Total 6298 478 109 429 \$5755 With deposits of \$100,000 or les 5993 12.02 101040 \$10/100 to \$250,00 6442 18550 03365 \$251,00 \$ 2500,00 58 1794 10862 19728 109,09 2501,000 \$ 8/1,000,00 26 993 17661 1385 15,62 Que \$1,00,00 2710 1/0// 47497 5571 igitized for FRASER

1	Distribution	of State Banks in	OKlahoma by	Amount of	Deposits - Se	ptember 23, 1908
O Programo or less	\$100,0000 \$100,000	Moosoo Hoss of less	\$100,000 less \$1,00,000	\$00,000 \$100,000		10 500,000 - 500,000 - 1000,000
28 23	45 55 70 27	42 5 16 37	23 34 74 86	36 23	113 111	376 702
53 30	26 25 59 27	9 30 13 23	\$ 66 18 53 8 12 50 55	7 34 22 49	149 -	283 567
46 33	14 81 6 41	52 42 13 2	3 18 21 26	42 38	127 189	312 1269
9 50	49 15 84 67	26 1 27 4	41 75 5 60	17 20	104 109	334
5 54 16 29	94 17 11 49 38 61 48 16	29 89 71 53	31 15 42 54 32 8 11 51	39 43	176 130	316
42 26	19 38 15 62 26 26 46 10	26 69 2 45 62 45 20 81	17 19 36 37 73 34 12 49	41 10	103 103	283
18 30	24 62 9 24	25 - 16 12	27 32 40 26	68 53	104 127	369
89 28 55 22	37 50 22 37	16 8 47 38	32 25 15 15	26 15	167 5,535	3.647
39 24	22 30 24 18	12 75 59 87	187 56 41 19 75 ×1 12 39	51 53 45 5	87	
39 /3	70 20 69 32	18 16 13 34 9 55 46 12	53 60 16 45	48 54	159	16134
0 71 37	97 49 16 49 23 9 - 68	7 39 79 24	23 85 12 26 40 88 23 15	14 16,136	140	3147
32 11	33 12 32 17	21 23 87 8	83 20 71 21	32	12.2	1269
37 20	11 18 29 40 21 19 20 57	17 49 18 99	27 64 10 48	12	108	
19 13	19 47 72 85	76 34 17 30	6 46 41 21 52 11 31 60	65 22	112	
52 64 46 18	21 31 48 17	48 4 35 7	36 9 17 49 5 20 51 12	14	134	
31 42	17 50 42 98	78 39 15 27	8 14 50 27 24 28 25 13	74 20	103	
6 16	44 11 26 5 59 55 16 19	44 19 61 15	52 28 24 27	22 22	(178)	
igitized for FRASER tps://fraser.stlouisfed.org		466 Ba	nki		41 Banks	11 bak 2 Park

Quand total 61:612		I Teanperited and Tatatales from
Grand That & 61,442 DISTRIBUTION OF	STATE BANKS IN OKLAHOMA BY	AMOUNT OF DEPOSITS, Nov. 10, 1910 See 15, 1910.
whom region I 693 bear		
900, and or less 100, on to 250, on to 5,00,	10 to 160,000 to 250,000 10,000 or to Continued	100 mo alex 100,000 thes 100,000 and less 100,000 ales 100,000 or lead
Manho 13 520 1328 34 Deg	waits in thousands of dollars) 62 64	154 89 11 13 70 20 80 83 59 67 61 69
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99 26 104 108 7261	185 174 40 31 13 42 V 216 145 7 62 69 V	33 34 5 69 34 59 32 56 93 - 61 100 - 95 - 46 - 9 57 80 14 5 5 1 71 - 17 25 - 83 53 27 41
79 52 155 131 250 434	216 145 7 62 69	9 57 - 80 14 5 1 71 17 25 - 83 53 27 41 - 45 56 49 49 64 36 35 - 79 76 35 54 54 54
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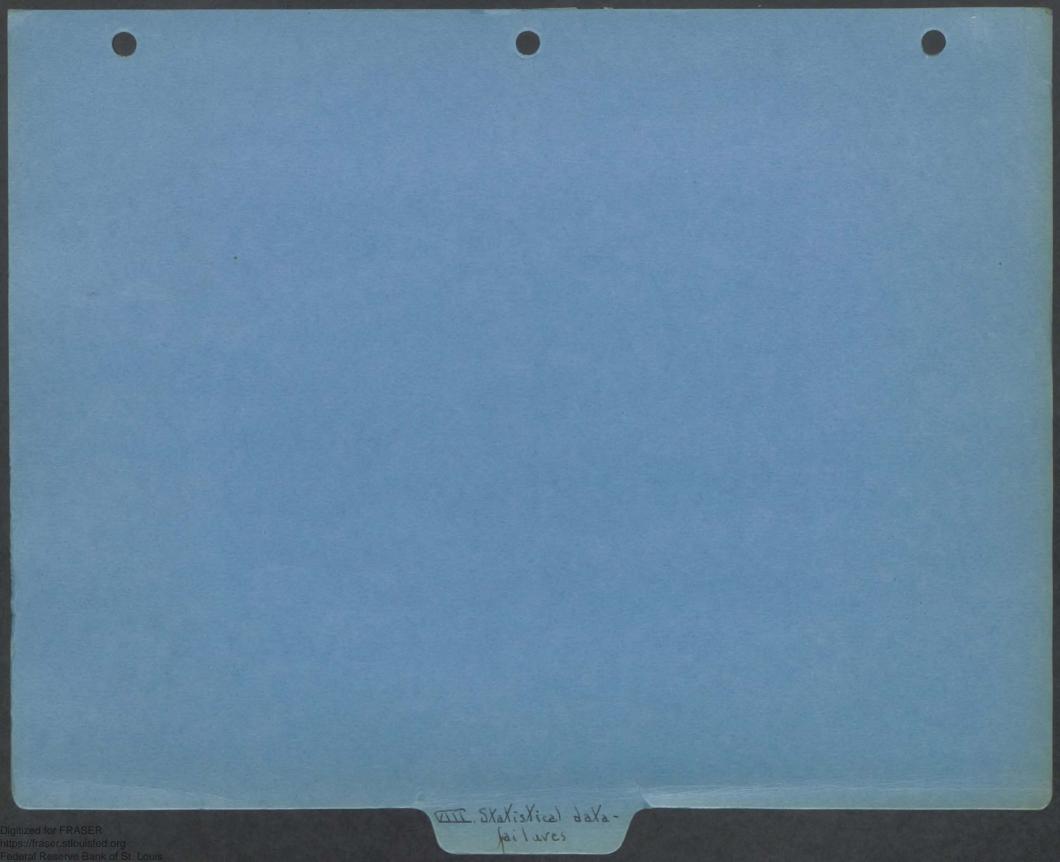
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Oklahoma - Recoveries and Losses of Incolvent Banks Table 54 you his care of the family for from Directly those of the family for from Directly that the tour stands of tabulation tracele 61 Total recovery Revovery Insured hose to Sumof by Fund 519 from deposits last three columns 1908 1 36,745 24,964 11781 24964 36745 36745 none 1909 3 1,561,834 1,679,922 61 156 615633 1,064289 1,125445 1,741 078 1910 3 584,959 244,844 313082 34250 347 332 240627 587959 1911 8 1,058,048 470,168 294981 1,065 149 525558 539591 230517 1912 4 534,837 222,628 312209 72778 384987 534837 149850 1913 16 1,692,807 917,082 798443 388498 1,186941 528584 1,715525 1914 6 440,732 248,946 202178 451124 88120 290298 160826 1915 6 332,463 133,743 198720 245264 46544 87199 332463 1916 1 40,337 2,500 37837 40337 37837 2500 1917 2 84,217 - 84217 84217 84217 1918 3 1,077,546 48,918 1,028 628 14389 1,043017 34529 1,077546 1919 6 906,039 129,245 776794 45754 822548 83491 906039 -248 685 +248 685 +249 695 1920 8 1,930,953 1,321,935 686646 61202 747848 1,260,733 2,008581 +187276 #373028 4373 727 -18727 (1,639260) 1,859 356 1,994 874 2214970 220096 5415002 1560772 27,479) (417, 378) (417,378) (27,479) (1,441688) (1,886,545) + 4300 3,791 672 1922 33 7,386,178 3791672 4,231672 10000 8,033 344 +4300 1923 11 1,017,047 581919 581919 6217131 456020 1,037939 + 230077 +621713 4621713 -23027 139 24,115,181 7,644,284 11,175137 Total 2,291 461 13,466598 5,352823 6,248464 25,067885 Totals 1908-Oct. 1921 7,606,805 6,384168 5,315344 2,291461 8,675629 119084 14,110057 Nov. 1921 - March, 1923 37,479 4,790969 4790969 37479 6.129380 10,957828 Note. For the majority of individual banks - in banks where Jund made payment - the estimate of guaranteel depost point directly from assets in derived by subtracting payment from Just from deports excluder there of good, etc. Bell in some cases this small be regulare, a inter for FRASER thy form essels has been assumed your - which is same as assumption that insulf got the Hend total in last column of 35,067,885 is

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Perereis Jem liquidar Justs Set part Trasta Directly By gueranty Total Departured Superius State Jund (indigents) cols 1+2+3 24,964 11781 24964. 367450 36 745 19 09 1,679,922, 61.156. 1125445 615633 1064289 1.741078 34250, 240627 274.877, 313082, 347332 1910 587959 770, 168, 294981 230597 525558. 1911 539591 1,065149 384987 149850 19/2 72778 -222,628, 3/2209. 534837 19 13 917,082,798443. 388498, 1186941. 528584 1715525 881201 19/4 248,946,202178, 290298, 160826 4 451124 46544 133,743 198720 245264 87199 332463 2,500, 37837. 37837 1916 2500 -40337 84217 19/18/19/19 84217 84217 48,918, 1028628, 14389 1043017. 34529 1,077546 129,245, 776794. 45754 822548 83491 6 906039 19 20 8 1,321,935, 686646. 747848. 1260733 -61202 2,008581 1,859,356.1994874. 220096. 2214970~ 1639 260 -1560 772 28 1921 5,415002 10,000 3791672 10000, 4231 672 3791672 19 77 33 8.033344 581919 456020 19 23 581919 1,037939 11 Total 139 7,644,284 11 1 10458 2,286711 13,397169 5,352552 6,248464 4750 69429 271 2291461 13,466598 5,352823 25,067885 11 1 73 137 2291461 7644284 = total paid by find

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[AVENT	Coalgate	Okla. City	Kiefer	Ochelata	Durant	Muskogee	Sapul pa	Geary-//	Mountaink	Okla City	Snyder	Okla. City	Sulphur 19-11
[OVER]	5-21-08	9-27-099	12-14-09	12-31-09-	4-28-10	8-25-10	11-11-10	5-3-11	4-10-11	4-5-11	5-20-11	6-7-11	6-18-11
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2	24964 48	1021717.57	25286.69	2237.36	4372,26	21/06,38	8771.69	4098.09	5655.07	111031.50	1800.72	28933.44	28631.26
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Claims approved by State Banken Bond - for deposts in banks not on our lest - ref. Vol. and page y minutes and date First Stale Bank of Picher \$5,000.00 TIL, 839. 11-17-19 See also back I seemd post W This addit appears in minutes of meeting of Wolff 1111-1113, State Benking Braid april 18, 1922, Volth 1111-1113, Evereing period from statebood to Fal 9, 1922. The third items are: for these three items in the ardit 1. Advanced to banks from State Busianty Fund and Fee Fund (not separated but presumably mistly busianty Feed. 7,634,151.79 2,064,298.83 2. amendo returned to the Generanty Frend. 5,569,852,96 3. Balance due 7ch, 9. 1922 2/ Fine callections not dassified by bank one not shows on these worksheets
See notes on minutes of State Bankey Brand, re pg 1215 de for FRASERIE de la partie y faille " shown in save en entry & indicate

telle now date of from attentions on the sin that book, Book was for which we entry to made here not listed in that book, Book was for which we entry to made here not listed in that book action probably prepared about 1926 at 1927, or begun earlier and not kept up after lest time a no antry for government depoils does not mean the bank had none - they may be included with individual degreets of an some cases it is probable that offsite of degrats against assits - at the beginning of the laquidation process - are omitted. The book gives a full asset and liability statement for each bank; a classification of the assets as Good dubtful, as worthless; callections from assets and shareholders (presumably find for banks fully equidated by the mid-19.30's but not find in these states of the states gnarenty fund; dishursements in deposits (dasseful as Irono paid my, individual come, and gottete), expenses and cash (presumably on hand at Jaine of Compelation as no entry appears for banks doed prior & 1921, and for only about helf of those closed in 1921), and also to guessenty Jund and Shareholders (no entry for latter two items in any bank doed in 1922 or later). I and 2 of gradet figures are collections and returns to quarty ford as show in the same book. Date presumably refer to a time about the mit -1922 and therefore are presumably lead complete Than either the audit of there was for compension of the fitter of 1930 surenting They are shown here was for compension of the first and the compension of the first and the contract of the stand by subtreation.

	OKLAHOMA -	Data from St	tate Banking	Department re	ecords - page	2	1	V	1	1	V	1	-
	(obtai	ined in Decem	nber 1955)										
	Farmers	First	State	Farmers &	Watonga	First	Oklahoma -	v	Chectaw	First	Oklahoma	The State	
MARKET STATE		State Bank	Guaranty Bk	Merchants Bk	State Bank	State Bank	State Bank	Bank of	Commercial	State Bank	State Bank	Bank of	Bank of
	Tishka 9-28-11	Shattinck 10-3-11	Watonga /2 2-19-12	Sapuppa 9-10-12	Watonga 19-22-12	Prgor 11-26-12	Sapulpa 1-14-13	Garvin 1-16-13	Spirorcial 2±4=13/	Okla. City 3-10-13	Hugo 3-17-13	Capitol Hill 4-25-13	Stilwell 5-28-13
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	Anadardo	V	Alva Secur-	Oklahoma	Union I	Farmers and	First	~ ~		Peoples Bank			Afton
	State Bank	Bank of	ity Bank	State Bank			State Bank	Bank of	Bank of	& Trust Co	Bank of	Commerce	Exchange Bank Afton
	Aandarko	Lawton	Alva 8_0_13	Okla. City 8-11-13	Muskogee	Snyder 9-18-13/	Wainwright 10-16-13	Foraker, 10-15-13	Spencer, 12-16-13	Muskogee	Elgin 2-5-14	Alva 4-14 /	4-7-14
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		data from St		Department :	records - pag	e 4 /	*	1	V V		/		
	Garfield F	armers and	Ponca	V	First	Farmers &	First V	Farmers	First	First	Citizens	Mineral	Liogan
	Exchange Bk	Merchants Bk	State Bank	Bank of		Merchants Bk	State Bank	State Bank	State Bank	State Bank	State Bank	Belt Bank	County Bank
Section 1	Enid M	ountain View	Ponca City	Mazie-15 3-24-15	Mannsville	Coweta	Row	Jesferson	Jay	Dewar	Tulsa	Tar River	Guthrie -/4
No.	5-27-14	2-10-151	2-22-150	3-24-19	9-30-15	12-21-15 -	11-1/-10	1-11-17	5-13-17	4-10-1	5-28-18	Tar River	1-21-192
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Find Prile to the assets The Ponea State Bank at the Time same was taken over by the Benk Commissioner, Mature of claim not described.
In later action (p.847) full dain was regorted as paid and Fisher Farmere and Miners Oplehma State Welson Merchants Centralia Farmers Farmeral sts apr 1922 Exchange ged frek Tar Given 24,040,00 5,200,00 andit 10,582.26 50.70 159.40 150.00 5,000,00 7565.69 200,00 24,040,00 3015.57 159,40 50,70 150,00 10,595,94

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	Citizens Bank	State Bank	State Bank	State Bank	Bank of		Exchange Bk	the state of the s	Bank of	First Bank	State Bank	State Bank	State Bank W
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2		3260.35		24263.32	13 803.53	140405		14/3000			9078.17	6000,00	
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TE	OKLAHOMA -	- data from S	tate Banking	Department	records - pag	e 6 /	33.	/	V the	N V			Chick years failing
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ederal Reserve Bank of St. Louis

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ederal Reserv	ve I	Bank	of S	St. Lo	uis						No.	Digital S		1000	1				100											-		-								-	-									-		1			

Note Banks listed on this page work not in FDIC list as failed prin OKLAHOMA data from State Banking Department records - page 11 date J. Not in 7R list at all. OM IT from talulation The Bank Bluepaket Farmera State Bank 7 ust set re Opalismer depost gnarante syptem Bluejacket mead maini 12-7-22 1-63-23 1-2-22 Formelle J FRM Jul 1923 nother toc Buyan allary Ottaron Dognito 3620184 3664164 10085 251 64594.56 Interstude Certification 18980,64 3094.05 32194.55 552585 Sarres 466.95 2777.79 8654 Cashinalker igitized for FRASER tps://fraser.stlouisfed.org 1285,61 14/00,00 9678911

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Box	NUMBER A.	Banks gri	ruped by	emount of	deposite	ONLANDI	74, 1700	-20			
0	1/2	1908	1910	1912	1914	1916	1918	19 20	11-10	Purentage	1
10.70						1770	1970	17 20	young	- Commission of the Commission	Jucage
	Number of State banks - total	520	693	617	562	551	582	621	4146		
20	#, oo, ood on leas	466	520	500	436	250	170		2512	60,68	5923
67	\$101,000 to \$250,000	41	/33	91	102	231	293	174	1159	27.95	359.4
50			34	20	20	54	76	119	334	8.06	47.7
15	\$501,000 to \$1,000,000		5	6	3	11	31	4/	99	239	142
5	\$ 1,00 1,000 to 2,000,000		1			4	9		29	72	4,7
1	Que 12,000,000						3	14	9	122	13
	Deposits of State Lanks-total	26587	61612	47775	44589	83983	(K D E 1/	-0.12			
	\$100, Dos or lead	16136	26590	24063	19987	15627	11937		547100		78157
	\$101,000 to \$250,000	5535	19150	13095	14444	34620.	45705	12059	176220		15056
	\$351,000 to\$500,000	3647	11/178	6446	6670	17661	25 33 4	40 437	111373		
	\$501,000 to \$1,000,000	1269	3362	4171	2307	7334	20824	27512	66779	20.36	75911
	\$1,001,000 to 2,000,000		1332		1181	6/20	11549	19833	40015		
	Over \$ 2,000,000					2621	8245	15454	26320		3760
											10 17 1
	Competation of suspension rate	tos Number	Average number	Number of	Suggerlyfor	Survey	Toperation to	supported !	Desport Bank	Standal .	1340 × 100
		1	operating bank	100		te10-25-21	Sales !		get 100 m som	t banks & 10-250/21	un net al
	Total	\$ 10-25-21	5923	130	21,9	12.7	78/57	29 407	\$3763	16049	920153
	Banked with deposits of -	72	13	10							
	# 100,000 or less	39	359.4	60	167	10.9	18056	3/73	17,57	2003	11:09
	\$ 100, 00 \$ \$250,00	19	16.68	40	24,2	1114	25174	6266	24,89	30/3	11.97
	\$ 257, as to 500, oro		487	20	41.9	25.0	15911	7238	457.49	4362	27,41
	8/ 01, 00 to 8/, 01, 00	3	147	64	1242,3	21.4	9540	4707	49,34	2379	24.94
	1 100 4 63, 000, 000	2	57.4	7	90 73.5	50.0	9476	8 023	84,67	4292	45,29
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ederal Reserve	- Bank of St. Louis				THE RESERVE OF THE PERSON NAMED IN		Design to the last of the last	THE RESERVE OF THE PARTY.		MARCHAN T	

SUCCEBUED STATE BANKS THAT REOPENED OR WERE
SUCCEBUED AND SUSPENDED AGAIN DURING PERIOR
OF DEPOSIT GUARANTY LAW

Oklahma State Back 11/11/10 Sapulpa 1/14/13 8/25/10 alamo Stato Back Muskoger 9/13/13 4/19/12 State Generally Back 10/22/12 Walinga 11/26/20 Back of Fore 11/27/23 Fore 10/22/21 Sugado 5-223 Bank of Grage Formers State Bank playe 1/23/23 Sage appletone State Back 10/11/21 Suttru 1/11/22 11/3/21 Bank of Commercial Sulphon 2/21/22 11/2/21[47 talulated-on) 2/25/22 tout the Bliss First State Park Same name Marland State Bark, Marland 2/25/22 8/15/21 Mismi State Buck Meani 12/7/22

Columbia Bark TUES Degras Sopt 3 3 65 00 Digitized for FRASER ttps://fraser.stlouisfed.org

ederal Reserve Bank of St. Louis

Largest Joseph Boules a paint Het lop as 582,283 Columbia Blot To Older City 9-28-09 2.742/38 1039,691 Bonk & Come Skowler 11-1-21 Welten Hall Ban Opleton 3-7-2 2,064,614 36/19/3 1,655,523 6.462,275 353,128, 550,/35 6-7-11 My Day Back akacing none 9-65,283 5-28-8 aligno Serting Tiba 587,95.9 Oblaha Sent Bark Buthut 10-11-21 838935 687,803 962,869 379.095 Convenil But El fine 821,076 5-11-22 339,569 Barleontla Elato BK 544.190 8-14-22 John Seato Bich Gill Bound 37/1100 805,125 12-14-10 2,718,654 5,487.621 4,702,341 1,949,896

1.09795'74 18.174 24.878 24.878 2898, on in June 26.476 Digitized for FRASER https://fraser.stlouisfed.org

Estemated bevering period of persten of begonitors garranty front for State banks Sw Irestin 1 back Year (stomand) Deports A. Banks placed in receiverships 490 Ramma 284 589 Hobert home. 120 (dains pent) 605 Picher 1706 (restrict 6 shown) 636 Lawton 80 (1141) 537 Histings 1921 647 Ada 374 (11 11 1 1922 395 (loss study) 993 649 admore 700 (") 1.004/ 661 Lawter (First N) 1922 B. Banks not placed in receivership (repred by Fed Ke, ver) 434 Lawten (Sec N) 449 Claremore 1922 148 Est at 9709 leposts, as in 253 · Augo 1922 1431 - Janepel (Cit. N) 1922 1922 1922 98 (Itallas 1363 1 Giowa 107

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SIZE DISTRIBUTION OF SUSPENUBD NATIONAL BANKS IN OKLAHOMA, Feb 14,1908 & march 31, 1923

		Number	
Total number of factures		15	
Bunks outh deposits of	Deport		
Bunks onth Leponets of Flavoton: Frist Natural of 1921 Al, and, and a more " Laroton: Frist Natural of 1921 " Noternal of 1922	1,004	} 2	
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45 W, W - 1, W. NO Cardinore: State National 1922	993	} /	
950, in - 500, on Hobart: First Natural 1919	284		
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Hugs: aty "1922 Vala: Merchants Manters N 1922	253 374		
	1794		
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Ballen - rensent	elulation (paged)	A IC - AIR A	-14V 1/2	SUC PEN	INEN BA	UVE IN	ON) A HAM	4 DARIN	E A PERATION	OF QUHPANT)	Y FUND
Total - 329,48	2	OBTRIBU		Too with	leprota of -	- 10	ON ZNNOM	A DON TIVE	d over white	or avernory	1 - 110
121000		,556	4	2-86,412	1 1	1-87,564	7-85,48	7 1-81,65	56	The A was and	2-84,807
D #10	v, over or le	20	8/00,000 8	8250,000	250,000	\$500,00	1500 200	41,000,000	Summan	of distribution	85000,000
Jan 1	1948 to Oct 25, 1821	ad 25, 1921	Jan 1, 1948	Oct, 25, 1921	Jan 1, 1948	ast 25,1921	\$1.00, and	3, 500, 000	Benks with Nums	les 70 y Deposts 12	7
,		mas 31, 1923	Oct 251921	mer 31,1923	at 25, 1921	mer 31, 1923		2,000,000	deposits of - of bas	les total (inthousands) total	7
Deports in 2	thousands odellars)						Jan 1, 1408	2,000,000 Jan 1: 1988	1-1-08 \$ 3-31-23		
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28	43 95 49	32 52	160 160	194. 104	267 286	466	825 berles		Under 100, 000 39		46.
98	28 14 47	70 42		194 107	496 383	2876	544		100,000-250,00 19		7
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Suspension rates or acting 0,8 1.1 trutal gensin rates 0.6 0,3 0.3 1508-1922 A. Number of suspended Harmful Notine 19/3 + -V 1922 120 129 -19/2 -19.13 5/9 Sin secesal in 1921 buty gitized for FRASER ps://fraser.stlouisfed.org -

nus; State banks Oblehma, Kansas, Texas, - reports of State bank commissione supplemented the Toxas by the willis Banking Liquing 1 1925.
Other States - suspended banks 1908-20 Willis, Banking Inquiry 21925 and Bradstreet's reports to the Competration of the Convery 1921-22 Federal Generic Bulletin.

- active banks N. reports of the Compostrator of the State banks, and bout tiend company Carrency of dates near Jane 30.

included, private bounded excluded,
report for 1936 - dates new Jan. 1. Mismi - Bent amminsoner Suspended banks: reports of Constroller of the Currency -workelete from 1934 study actual banks: reports of Competently of the Currency, for dates near Jan. 1. Somes: Notinet banks igitized for FRASER

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10 Milk		09				46-1			68-R							
19			1768619	149		111-2										
15			20181		493-2	15-Z	230		77-R			292386	32969	62024		
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19	N	19	301	993647	524	2/2-1	196	596-R	1099-19		249 788	581431		190 618	15624	91798
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19 08 4 533 - 4218 181		21		2945-26		771	12525	995	777		271518	655626	86312	279 752	17/623	89614
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Sources: see unkolent A. Number of suspended backs per in active banks.

L. Liebblus as reported by Brodstreets & Crystolla I the Carreny, From 1934 morkedents.

R. Besurus as rejented by Willis, Banking Inquiry 71925, From 1934 morkediets

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States 1908-1922 . Oklahoma and contegerous C. Rates by years for all contigues States combined Six States contiguous OKlahoma Ko OKlahoma Deports banks x 1166 Deproits of Number of Suspended bonds Deposits of Deposits of suspended banks active banks per woodchive blus suspended banks derive banks deposits in active by per 100 activie YEar banks Banks 0.2 0,5 9.09 0.4 1.08 1,70 1,2 3 1 35 63/11 0.6 1,39 2,6 4.36 0,93 582 34 0,9 46 131 37 29 0,69 48 460 0.08 0,10 0.5 0.87 1,144630 0,9 0.75 19 19 1,238707 1.87 1.3 190 900 4.0 3.72 1,399984 5,6 7.30 1,370639 Toxal Cover 1,36 \$2,32 0,56 12,640518 \$0.45 1,202126 43 621 19/12 26 = 8.45-28 109 693 19 16 180 550 1,251773 1/33 1.446544 1,321 950 2/8 338 1,900 136 1,488453 273 691 24711.2 1,326881 itized for FRASER \$0.28 0,23 s://fraser.stlouisfed.org

OKLAHOMK. Rates for entire period Janl, 1908 8. Mar 31, 1933, as pllows! Number of suggested banks 120 + 10 = Aggregate number of action banks for computation of trate 8796 + 116 (one-fruith of number operating 1-1-23) = 8912 1, 46 Suspensions per 100 setiol 29,407 (in thursands) Deports of suspended banks 27.887 + 15-20 = Aggregate deposits of active banks for computation of rate 11202,126 + 1875 7 (are-fruth J Legorit 1-1-23) = 1,220,883 (" Deposits in suspended banks per \$100 in active banks.
Retes for selected periods: 1908-1919 & 1900 active NN.1921- War, 1923 813 (No on 12-31-24 from From 5-16a) 6.79 - 13 no on 12-31-22 (CC) + 13 no on 12-31-22 from From 5-16a Number of suspended barba (adjustify yets) 70,19 [aum 1/908] 1116 [9 min 1920 plus] 0,50 1.70 Rates, suspended of active #324,794, NO Thinker \$ 13,358,00 \$737,974,00 Deposits of suspended banks (adjuisted aggraph) 98,31 In suspended per \$ 100 in active 6137 11,82

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Suspension retes in Oklahome and configures States 1908-1922 D, Rates by States for entere period In she - aggregets - as add for pages A+B Number Suggested freige Deports in Deports in Average Number of Suspended Average Coppets in suspended Average Osasperdo bembo per lepoits in suspended duspended number of suspender banks per deports in 100 spereting agerating 100 specifing operating Thousands barbo per banks banks banks 1908-1922 banks Banks (thursday) you in banks burks 1908-1922 banks operaty banks (thousands) (thousands) All commer call banks Natural 6/91 4,3 20051.1 Oklahman 33870 4.0 911 133 \$ 1.42 16656 70277 45760 1545/191 28091609 Siz States Sex contigues states 1872774 14621 1,039073 3,88 224 Kansas 4647 279010 Karsas 183 1172 Missourie Mo. 130 366938 1432 10577 792515 1,33 arkansas 9.19 60 395 93093 ank 2097 34/3/ Tax Toxas 1285 1051 484909 374/6 530 20 6,489 3,8 350 533 7820 2,23 New Mexico 94 41 4,24 29 30.9 3577 11,92 30006 N. Mex 12,2 202/6 Glorado 6387 193 261 119 2856 2.07 42 3.30 138169 91,04 218 EntereUS. 115279 Entire United States 667,429 2411 24,508,00 Other than relimat Hos Bran Kerney 34.80 30 to 05 12640518 53621 6.73 3576 6 States 842701 948 Kans! 5450 158924 425577 1302 10577 10,96 335 ank 17.0 58942 6458 1756 27.75 755 869 144 117 134376 53 24 45,3 27/78 N. Meso 9790 2720 183 36 641 55092 3531 94.11 Entere 45 2020 6 1815 13,417,00 551,742 itized for FRASER s://fraser.stlouisfed.org

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LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923

Location and name	Date of closing	Deposits1/	Loss to guaranty fund2/	Disposition
Coalgate: International Bank of Coalgate	<u>1908</u> May 21	A - \$ 36,745	None	Liquidated (completed Sept. 4, 1908)
	1909			
Oklahoma City: Columbia Bank & Trust Company	Sept. 27	A -2,742,138	A \$ 582,284	Liquidated
Kiefer: First State Bank of Kiefer	Dec. 14	A - 76,482	A 44,000	Liquidated
Ochelata: Bank of Ochelata	Dec. 31	A - 53,894	B 18,023 (9-30-10)) Succeeded By the Oklahoma State Bank
Description of the Description	1910	707 (00	3/	
Durant: Oklahoma State Bank	Apr. 28	A 121,632	B 25,000 ³ /	Absorbed by Guaranteed State Bank
Muskogee: Alamo State Bank4/	Aug. 25	A - 360,000 (11-10-10		Reorganized as Union State Bank
Sapulpa: Creek Bank & Trust Company	Nov. 11	A - 109,859	A 46,418	Succeeded by the Oklahoma State Bank
Mountain Park: Citizens Bank	1911	12 620		
mountain Park: Citizens Bank	Apr. 10	A - 43,638	В 17,559	Succeeded by the Planters State Bank of Mountain Park
Geary: Bank of Commerce	May 3	A - 56,247	B 23,024 (1-1-13)	Absorbed by the American State Bank of Geary
Oklahoma City: Planters & Mechanics Bank	Apr. 6	A - 245,634	A 105,626	Liquidated
Snyder: Bank of Snyder	May 20	A - 43,243	В 18,732	Absorbed by the Kiowa County Bank of Snyder
Oklahoma City: Night & Day Bank	June 7	A - 459,283	A 365,229	Absorbed by the Wilkin-Hale State Bank
Sulphur: Security State Bank	June 18	A - 108,137	A 26,557	Absorbed by the Bank of Commerce, Sulphur
Shatluck: First State Bank	Oct. 3	A - 55,686	B 20,004	Liquidated through Guarantee State Bank,
Tushka: Farmers State Bank	Sept. 28	A - 27,957	B 26,827	Shatluck
	1912		603,558 604	Absorbed by Planters State Bank of Tushka
Natonga: State Guaranty Bank	Feb. 19	A - 58,000 (11-10-10		Succeeded by Watonga State Bank
Sapulpa: Farmers & Merchants Bank	Sept. 10	A - 447,862	A 105,383	Liquidated
Natonga: Watonga State Bank	Oct. 22	A - 30,221	В 9,936	Absorbed by the Blaine County Bank of Water
Prior: First State Bank	Nov. 26	A - 75,000 (11-10-10		Succeeded by American State Bank of Pryor
	1913		1131	
Sapulpa: Oklahoma State Bank	Jan. 14	A - 160,258	B 48,722 (1-1-15)	Absorbed by the Sapulpa State Bank
Garvin: Bank of Garvin	Jan. 16	A - 59,489	B 58,718 (1-1-15)	
Spiro: Choctaw Commercial Bank	Feb. 4	A - 64,946	B 18,225 (1-1-15)	Succeeded by the Spiro State Bank
Oklahoma City: First State Bank	Mar. 10	A - 277,805	A 148,261	Reopened with same name
Hugo: Oklahoma State Bank	Mar. 17	A - 35,813	B None	Absorbed by First State Bank of Hugo
Capitol Hill: The State Bank of Capitol Hill		A - 63,225	A 36,004	Succeeded by Capitol State Bank
Stilwell: Bank of Stilwell	May 28	A - 67,301	B 29,260 (1-1-15)	
Anadarko: Anadarko State Bank	June 3	A - 162,585	B 63,213 (1-1-15)	Liquidated
Lawton: Bank of Lawton	July 14	A - 62,842	B 44,204 (1-1-15)	Liquidated through Citizens' State Bank
Alva: Alva Security Bank	Aug. 9	A - 205,606	B 86,939 (1-1-15)	Absorbed by Central State Bank of Alva

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LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

Number N	Location and name	Date of closing	Deposits1/	Loss to guaranty fund2/	Disposition
Chancam City: Oklahoma State Bank Aug. 11		1913 (cont.)			
A - 7,393 Absorbed by American National Bank of Nuckeyee Union State Bank Sept. 16 A - 38,449 B - 13,800 (1-1-15) Consolidated with Klowa National Bank; succeeded by Klowa State Bank Sept. 16 A - 48,213 B - 15,500 (1-1-15) Succeeded by Klowa State Bank Sept. 16 A - 48,213 B - 15,500 (1-1-15) Succeeded by Klowa State Bank Sept. 16 A - 31,671 B - 21,896 (1-1-15) Succeeded by Klowa State Bank Sept. 16 A - 31,671 B - 21,896 (1-1-15) Succeeded by Klowa State Bank Sept. 30 A - 54,808 B - 48,758 (1-1-15) Succeeded by Klowa State Bank Sept. 30 A - 54,808 B - 48,758 (1-1-15) Succeeded by Klowa State Bank Sept. 30 A - 26,7972 Sept. 30,200 (1-1-7)	klahoma City: Oklahoma State Bank		A - 487.244	A - 61.743	Absorbed by Tradesmens State Bank
Sept. 16	uskogee: Union State Bank V				Absorbed by American National Bank of
Dec. 16 A - 10,726 B - 6,867 (1-1-15) Liquidated	nyder: Farmers and Merchants Bank	Sept. 16	A - 38,449	B - 13,800 (1-1-15)	Consolidated with Kiowa National Bank;
Dec. 16 A - 10,726 B - 6,867 (1-1-15) Succeeded by Spencer State Bank	ainwright: First State Bank V	Oct. 16	A - 48,213	B - 15,500 (1-1-15)	Succeeded by The Farmers State Bank
Dec. 16 A - 31,671 B - 21,896 (1-1-15) Succeeded by Spencer State Bank 1914 18kogee: Peoples Bank and Trust Company 1918 18hore of Elgin 1919 1919 1919 1919 1919 1919 1919 19		Oct. 31			
18kogee Peoples Bank and Trust Company Jan. 31	pencer: Bank of Spencer	Dec. 16		B - 21,896 (1-1-15)	Succeeded by Spencer State Bank
Sin Bank of Elgin	sekarase Panlar Penk and Trust Company		A - 5/ 808	B / / 9759 (1-1-15)	Liquidated
Bank of Commerce					
## Apr. 7					
Afton Succeeded by Garfield County Bank of Enid A - 105,570 1915					
1915 Dec. 21					Afton
Dec. 21	nid: Garfield Exchange Bank	May 27	A - 251,143	A - 105,570 203,047 203	
with tain View: Farmers & Merchants Bank Feb. 16 A - 67,961 B - 30,988 (1-1-17) Succeeded by Bank of Mountain View Max City: Ponca State Bank Feb. 22 A - 94,391 B - 19,179 (1-1-17) Absorbed by Oklahoma State Bank of Ponc Liquidated through Citizens State Bank, Wagoner Succeeded by Mannsville State Bank with First State Bank Nov. 17 A - 40,337 5/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1/1		1915			
Succeeded by Bank of Mountain View: Farmers & Merchants Bank Feb. 16 A - 67,961 B - 30,988 (1-1-17) Succeeded by Bank of Mountain View Feb. 22 A - 94,391 B - 19,179 (1-1-17) Absorbed by Oklahoma State Bank of Ponc Liquidated through Citizens State Bank of Mazie Mar. 24 A - 14,026 None Liquidated through Citizens State Bank Wagoner Succeeded by Mannsville State Bank Sept. 30 A - 32,340 None Succeeded by Mannsville State Bank Sept. 30 A - 40,337 Succeeded by Mannsville State Bank Sept. 30 A - 40,337 Succeeded by Mannsville State Bank Sept. 30 A - 40,337 Succeeded by Mannsville State Bank Sept. 30 A - 40,337 Succeeded by Mannsville State Bank Sept. 30 A - 40,337 Succeeded by Mannsville State Bank Sept. 30	oweta: Farmers & Merchants Bank	Dec. 21	A - 102,822	B - 25,000 (1-1-17)	Succeeded by First State Bank of Coweta
mar City: Ponca State Bank mar. 24 A - 94,391 Mar. 24 A - 14,026 None Liquidated through Citizens State Bank Wagoner Succeeded by Mannsville State Bank May 13 A - 40,337 May 13 A - 40,972 May 13 A - 40,972 May 13 A - 120,117 B - 10,076 (1-1-19) Succeeded by Dewar State Bank May 28 A - 965,283 May 28 A - 113,575 B - 12,179 (1-1-17) Absorbed by Oklahoma State Bank of Ponc None None None Absorbed by Mannsville State Bank May 13 A - 46,972 None Absorbed by The Bank of Jefferson None Absorbed by Delaware County Bank of Jay War: First State Bank May 28 A - 965,283 None B - 10,076 (1-1-19) Succeeded by Dewar State Bank Absorbed by American National Bank of Talsa Succeeded by Cardin State Bank Absorbed by Cardin State Bank Liquidated 1917 Succeeded by Dewar State Bank Absorbed by American National Bank of Talsa Succeeded by Cardin State Bank Liquidated 1918 A - 261,000 5/	ountain View: Farmers & Merchants Bank	Feb. 16			
Mar. 24 A - 14,026 None Liquidated through Citizens State Bank, Wagoner Succeeded by Mannsville State Bank W: First State Bank Nov. 17 A - 40,337 None 1916 Nov. 17 A - 40,337 None 1917 Jan. 11 A - 38,026 Y: First State Bank May 13 A - 46,972 None Absorbed by The Bank of Jefferson Absorbed by Delaware County Bank of Jay war: First State Bank May 28 A - 965,283 Rome Absorbed by Dewar State Bank None Absorbed by Dewar State Bank None Absorbed by American National Bank of Tulsa r River: Mineral Belt Bank July 26 A - 113,575 B - 24,000 (1-1-19) Succeeded by Cardin State Bank Lithrie: Logan County Bank Apr. 0 A - 261,000 Apr. 0 A - 286,000		Feb. 22			
mnsville: First State Bank Sept. 30 A - 32,340 None 75 Succeeded by Mannsville State Bank w: First State Bank 1916 Nov. 17 A - 40,337 5/ Iliquidated 1917 Iniquidated 1918 May 13 A - 46,972 None Absorbed by The Bank of Jefferson Absorbed by Delaware County Bank of Jay war: First State Bank May 13 A - 46,972 None Absorbed by Delaware County Bank of Jay war: First State Bank May 28 A - 965,283 River: Mineral Belt Bank July 26 A - 113,575 B - 24,000 (1-1-19) Succeeded by Mannsville State Bank None Absorbed by The Bank of Jefferson Absorbed by Delaware County Bank of Jay None Tulsa Succeeded by Cardin State Bank Absorbed by American National Bank of Tulsa Succeeded by Cardin State Bank Absorbed by Cardin State Bank	azie: Bank of Mazie				Liquidated through Citizens State Bank,
w: First State Bank Nov. 17 A - 40,337 5/ // Liquidated None Absorbed by The Bank of Jefferson Absorbed by Delaware County Bank of Jay Liquidated Liquidat	annsville: First State Bank		A - 32,340	None 75,167 75	
Interest State Bank Jan. 11 A - 38,026 None Absorbed by The Bank of Jefferson A - 46,972 None Absorbed by Delaware County Bank of Jay Bank Jay 28 A - 965,283 None Absorbed by Dewar State Bank Tulsa Bank of Jay 26 A - 113,575 B - 24,000 (1-1-19) Succeeded by Cardin State Bank Jay 26 A - 113,575 B - 24,000 (1-1-19) Succeeded by Cardin State Bank Jay 26 A - 113,575 B - 24,000 (1-1-19) Succeeded by Cardin State Bank Jay 26 A - 286,000 Jay 27,076 State Bank Jay 28 A - 286,000 Jay 27,076 Jay 28,000 Jay				CE2	tal T
A - 38,026 None A bsorbed by The Bank of Jefferson A - 46,972 None Absorbed by The Bank of Jefferson A - 46,972 None Absorbed by Delaware County Bank of Jay B - 10,076 (1-1-19) Succeeded by Dewar State Bank Apr. 10 A - 120,117 B - 10,076 (1-1-19) Succeeded by Dewar State Bank Absorbed by American National Bank of Tulsa	ow: First State Bank	Nov. 17	A - 40,337	5/ //11/1	Liquidated
y: First State Bank May 13 A - 46,972 None Absorbed by Delaware County Bank of Jay war: First State Bank Apr. 10 A - 120,117 B - 10,076 (1-1-19) Succeeded by Dewar State Bank las: Citizens State Bank May 28 A - 965,283 None B - 10,076 (1-1-19) Succeeded by Dewar State Bank Absorbed by American National Bank of Tulsa Tulsa Tulsa Succeeded by Cardin State Bank Ar 131,575 B - 24,000 (1-1-19) Succeeded by Cardin State Bank Tulsa Succeeded by Cardin State Bank Apr. 9	CO Description of the Park				
war: First State Bank Apr. 10 A - 120,117 B - 10,076 (1-1-19) Succeeded by Dewar State Bank Absorbed by American National Bank of Tulsa Tulsa					
war: First State Bank Apr. 10 A - 120,117 B - 10,076 (1-1-19) Succeeded by Dewar State Bank Apr. 10 A - 965,283 None Absorbed by American National Bank of Tulsa Tulsa Trulsa Tulsa Thrie: Logan County Bank Jan. 31 A - 261,000 A - 286,000 A - 286,000 A - 286,000	y: First State Bank	May 13	A - 40,972	None	Absorbed by Delaware County Bank of Jay
A - 965,283 None Absorbed by American National Bank of Tulsa Trulsa Trulsa					
Tulsa Trans Tr					
1919 Apr. 9	ilsa: Citizens State Bank	May 28	A - 965,283	None	
thrie: Logan County Bank Jan. 31 A - 261,000 5/ Thurton: Citizens Bank Apr. 9	ar River: Mineral Belt Bank	July 26	A - 113,575		Succeeded by Cardin State Bank
Iburton: Citizens Bank Apr. 9 A - 286,000 5/					
Apr. 9 A - 286,000 5/ Intinel: Oklahoma State Bank May 3 A - 153,000 5/ Ilett: First State Bank July 15 A - 52,000 5/ Aatherford: Farmers State Bank Aug. 4 C - 150,000 5/	uthrie: Logan County Bank			5/	
Illett: First State Bank May 3 A - 153,000 5/ Satherford: Farmers State Bank Aug. 4 C - 150,000 5/	Ilburton: Citizens Bank	Apr. 9		5/	
Allett: First State Bank Suly 15 A - 52,000 Solution of the state Bank Suly 15 A - 52,000 Sulting of the state Bank Sultin	entinel: Oklahoma State Bank	May 3	A - 153,000	5/	7)
atherford: Farmers State Bank Aug. 4 C - 150,000 5/	allett: First State Bank	July 15	A - 52,000	5/	tat 28 164
	eatherford: Farmers State Bank	Aug. 4		5/_ (8	and the state of t

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LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

Location and name	Date of closing	Deposits1/	Loss to guaranty fund2/	Disposition
	1920			
ones: Bank of Jones	Oct. 6	C - 180,000	5/	
Mulhall: Mulhall State Bank	Oct. 11	C - 115,000	5/ 5/ 5/ 5/ 5/	
Soswell: State Exchange Bank	Nov. 15	C - 383,000	5/	
oalgate: Citizens State Bank	Nov. 19	C - 575,000	5/	415/04
oss: Bank of Foss	Nov. 26	C - 191,000	5/	Cotal W
allis: First Bank of Fallis	Nov. 27	0 - 75,000	1 2	Ja Herrists]
arietta: First State Bank	Nov. 30	C - 498,000	917,0006/	(05) 100
hawnee: Security State Bank	Dec. 13	C -1,550,000	1 711,000	35 { Est of 45 % }
nawnee. Security State Dank	DOC . 1)	0 -1,,,,,,,,		
7/	1921		7/	
da: Farmers State Bank7/	January	C - 246,000	c - 50,000 ⁷ /	
iefer: Central State Bank	May 3	B - 359,000	C - 171,525	Succeeded by Security State Bank
iefer: Exchange State Bank	May 3	B - 128,000	C - 109,385	Succeeded by Security State Bank
enks: Bank of Jenks	May 3	B - 173,000	C - 137,404	Succeeded by First State Bank of Jenks
ylesworth: First State Bank	July 30	B - 28,000	C - 4,508	Liquidated(5-31-24)
Pershing: Pershing State Bank	Aug. 15	B - 77,000	C - None	Succeeded by Security State Bank
iami: Miami State Bank	Aug. 15	B - 285,000	C - 91,200	Succeeded by First State Bank
ontotoc: Bank of Pontotoc	Sept. 15	B - 93,000	C - 56,470	Absorbed by Guaranty State Bank, Tishomingo
lbion: First State Bank	Sept. 20	B - 39,000	C - 12,880	Reopened by Albion State Bank
riftwood: Citizens State Bank	Oct. 10	B - 93,000	C - 56,973	Succeeded by Security State Bank
uthrie: Oklahoma State Bank	Oct. 25	B - 839,000	C - 589,059 1277	Succeeded by Guthrie State Bank
			Loss to	
			depositors8/	
offman: First Bank of Hoffman	Oct. 25	B - 70,000	C - 119,084	Liquidated (5-10-29)
kmulgee: Bank of Commerce	Nov. 1	B -2,065,000	C -1,039,691 (1931)	Liquidated
ulphur: Bank of Commerce	Nov. 3	B - 329,000	C - None	Reopened with same name
liss: First State Bank	Nov. 12	B - 94,000	C - None	Reopened with same name
reston: Oklahoma State Bank	Nov. 12	B - 103,000	C - 138,298	Liquidated (5-10-29)
mo: Imo State Bank	Nov. 15	B - 71,000	C - 29,862	Liquidated (12-15-28)
oltry: Bank of Goltry	Nov. 16	B - 112,000	C - 78,044	Liquidated (8-13-28)
illerton: Bank of Millerton	Nov. 17	B - 40,000	C - None	Succeeded by Citizens State Bank of Millerton
elaware: Delaware State Bank	Nov. 17	B - 124,000	C - 30,956	Succeeded by First State Bank
tonewall: First State Bank	Nov. 30	B - 108,000	C - None	Reopened with same name
iami: Miami Trust & Savings Bank	Dec. 10	B - 290,000	C - 58,905	Absorbed by Ottawa County National Bank
hattanooga: Chattanooga State Bank	Dec. 12	B - 112,000	C - 5,795	Liquidated (6-27-30)
eno: Bank of Meno	Dec. 20	B - 62,000	C - 40,103 (1931)	Liquidated
ensacola: First State Bank	Dec. 30	B - 39,000	C - 20,034	Absorbed by First State Bank, Vinita
	200.00	27,000		nessited by The Board Bank, Vinita
			1560,972 1561	

LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

Location and name	Date of closing	Deposits1/	Loss to 8/	Disposition
	1922			
Kenefick: Farmers State Bank	Jan. 10	B - 49,000	C - 35,632	Liquidated (6-27-29)
Guthrie: Guthrie State Bank	Jan. 11	B - 390,000	C - 271,627 (19	
burant: First State Bank	Jan. 25	B - 235,000	C - 206,731 (1	
Morris: First State Bank	Jan. 27	B - 132,000	5/	Succeeded by Peoples State Bank
Bliss: First State Bank	Feb. 25	B - 52,000	C - None	Succeeded by Marland State Bank, Marland
El Reno: Commercial Bank	Feb. 28	B - 963,000		931) Liquidated
Sulphur: Bank of Commerce	Feb. 28	B - 364,000	C - 303,995 (1	
klahoma City: Wilkin-Hale Bank	Mar. 8	B = 1,666,000	0 - 361,713 (1	
alters: Oklahoma State Bank	Mar. 10	B - 287,000	C - 106,086	Liquidated (8-15-29)
tratford: State Bank of Stratford	Mar. 1	B - 104,000		Liquidated (11-20-28)
rick: Western State Bank	Mar. 15	B - 107,000	(1)	Liquidated (11-20-26)
dmond: Edmond State Bank	Mar. 15			Liquidated (11-30-24) Liquidated (9-28-22)
addo: Oklahoma State Bank	Mar. 18		- , ,	
layton: First State Bank of Clayton	Mar. 27			
ilson: Wilson State Bank		B - 42,000	,	Liquidated (6-25-29)
ark Hill: Farmers State Bank	Apr. 3	B - 178,000	C - None	Succeeded by Producers State Bank
artlesville: Bartlesville State Bank	Apr. 7	B - 32,000		931) Liquidated
	May 11	B - 821,000	C - 379,095 (1º	
ann: Peoples Bank & Trust Co.	May 18	B - 70,000	C - None	Succeeded by Bank of Wann
	June 17	B - 42,000	0 - 20,511	Liquidated (10-1-27)
larita: First State Bank	Aug. 3	B - 156,000	C - 122,777	Liquidated (5-13-29)
omanche: Farmers State Bank	Aug. 7	B - 194,000		931) Liquidated
ale: Yale State Bank	Aug. 14	B - 544,000		931) Liquidated
awnee: Security State Bank	Aug. 14	B - 194,000	0 - 132,835	Liquidated(12-5-28)
lencoe: Farmers State Bank	Aug. 17	B - 143,000		931) Liquidated
uskogee: Central State Bank	Aug. 18	B - 498,000	C - 359,900	Liquidated (5-9-29)
ore: Farmers Bank of Illinois	Sept. 14	B - 47,000	C - 36,608	Liquidated (5-9-29)
ichmond: Bank of Richmond	Sept. 18	B - 36,000	0 - 30,912	Liquidated (11-1-29)
rowder: Bank of Crowder	Oct. 6	B - 76,000	C - 60,230 (1	931) Liquidated
noctaw: State Bank of Choctaw	Nov. 2	B - 96,000	C - 74,027	Liquidated (11-24-28)
agoner: First State Bank	Dec. 21	B - 252,000	C - 149,368	Liquidated (12-15-28)
comide: Bromide State Bank	Dec. 29	B - 70,000	C - 58,266	Liquidated (12-7-29)
			1173 1	123
	1923		块231,0	
ennings: Oklahoma State Bank	Jan. 1	B - 119,000	C - 94,894	Liquidated (5-21-30)
oodward: Central Exchange Bank	Jan. 16	B - 466,000	C - 234,348	Succeeded by Bank of Woodward
Llen: First State Bank	Jan. 22	B - 137,000	C - 25,866	Succeeded by Depositors State Bank
twood: First State Bank	Jan. 25	B - 49,000	C - 12,800	Succeeded by Farmers State Bank
shland: First State Bank	Jan. 25	B - 39,000	C - 16,553	Liquidated (12-15-28)
age: Farmers State Bank	Jan. 27	B - 230,000	C - None	Reopened with same name
oss: Foss State Bank	Jan. 28	B - 69,000	C - 14,471	Succeeded by Farmers State Bank
ash: Farmers & Merchants Bank	Feb. 12	B - 165,000	C - None	Succeeded by Farmers State Bank
chille: Guaranty State Bank	Feb. 12	B - 25,000	C - 18,611 (19	
allisaw: Sallisaw Bank & Trust Co.	Feb. 19	B - 221,000	C - 38 1.77	Suggested by Sommitty State Bonk
		2 200	456,020	436 Succeeded by Security State Bank

LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

- - B from schedules submitted to Federal Reserve Committee on Branch, Group and Chain Banking.
 - C Rand McNally Bankers Directory.
- 2/ A from Robb, The Guaranty of Bank Deposits. Figures presumably represent final loss to guaranty fund. Slightly larger figures for some of these banks are given in the biennial reports of the Bank Commissioner for net payments by the guaranty fund to January 1, 1913, or January 1, 1915.
 - B from biennial reports of the Bank Commissioner. Figures represent net payments to date indicated.
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- 3/ Paid by State Banking Board to absorbing bank to protect it against loss.
- 4/ This case is listed in the Report of the Bank Commissioner as a reorganization, with no mention of any assistance by the guaranty fund.
- 5/ No data available.
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- 9/ Deposits November 10, 1910, amounting to \$360,322, are those of the Union State Bank, which was a reorganization of the Alamo State Bank, the banking board agreeing to protect it against loss. The deposit figure for November 10, 1910, is probably similar to that for the Alamo State Bank at the time of reorganization on August 25, 1910.

Cooke's figure for the amount of warrants issued in the case of the 13 banks.

POBSILETE. This was prepared defer trips

LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923

Location and name	Date of closing	Deposits1/	Loss to guaranty fund2/	Disposition
			Sunt and Turn	
Coalgate: International Bank of Coalgate	1908 May 21	A - \$ 36,745	A None	Liquidated (completed Sept. 4, 1908)
	1909	en til var		
Oklahoma City: Columbia Bank & Trust Company	Sept. 27	A -2,742,138	A \$ 582,284	Liquidated
Kiefer: First State Bank of Kiefer	Dec. 14	A - 76,482	A 44,000	Liquidated
Ochelata: Bank of Ochelata	Dec. 31	A - 53,894	B 18,023 (9-30-10)	Succeeded By the Oklahoma State Bank
	1910		2/	
Durant: Oklahoma State Bank,	Apr. 28	A 121,632	B 25,000 ³	Absorbed by Guaranteed State Bank
Muskogee: Alamo State Bank4	Aug. 25	A - 360,000 ² (11-10-10)) A 160,911	Reorganized as Union State Bank
Sapulpa: Creek Bank & Trust Company	Nov. 11	A - 109,859	A 46,418	Succeeded by the Oklahoma State Bank
	1911			
Mountain Park: Citizens Bank	Apr. 10	A - 43,638	B 17,559	Succeeded by the Planters State Bank of Mountain Park
Geary: Bank of Commerce	May 3	A - 56,247	B 23,024 (1-1-13)	Absorbed by the American State Bank of Geary
Oklahoma City: Planters & Mechanics Bank	Apr. 6	A - 245,634	A 105,626	Liquidated
Snyder: Bank of Snyder	May 20	A - 43,243	В 18,732	Absorbed by the Kiowa County Bank of Snyder
Oklahoma City: Night & Day Bank	June 7	A - 459,283	A 365,229	Absorbed by the Wilkin-Hale State Bank
Sulphur: Security State Bank	June 18	A - 108,137	A 26,557	Absorbed by the Bank of Commerce, Sulphur
Shatluck: First State Bank	Oct. 3	A - 55,686	B 20,004	Liquidated through Guarantee State Bank,
Tushka: Farmers State Bank	Sept. 28	A - 27,957	В 26,827	Shatluck Absorbed by Planters State Bank of Tushka
Watonga: State Guaranty Bank	Feb. 19	A - 58,000 (11-10-10)	5/	Succeeded by Watonga State Bank
Sapulpa: Farmers & Merchants Bank	Sept. 10	A - 447,862	A 105,383	Liquidated
Watonga: Watonga State Bank	Oct. 22	A - 30,221	B 9,936	Absorbed by the Blaine County Bank of Wator
Prior: First State Bank	Nov. 26	A - 75,000 (11-10-10)		Succeeded by American State Bank of Pryor
	1913			
Sapulpa: Oklahoma State Bank	Jan. 14	A - 160,258	B 48,722 (1-1-15)	Absorbed by the Sapulpa State Bank
Garvin: Bank of Garvin	Jan. 16	A - 59,489	B 58,718 (1-1-15)	Succeeded by Farmers' State Bank of Garvin
Spiro: Choctaw Commercial Bank	Feb. 4	A - 64,946	B 18,225 (1-1-15)	
Oklahoma City: First State Bank		하는 사람들은 아이를 하고 하고 하는 사람이 있다. 그렇게 되었다면서 그렇게 되었다면서 하는 사람이 없어 없다.	A 148,261	Reopened with same name
Hugo: Oklahoma State Bank	Mar. 17		B None	
Capitel Hill: The State Bank of Capitol Hill			A 36,004	
Stilwell: Bank of Stilwell	May 28		B 29,260 (1-1-15)	Stillwell
Anadarko: Anadarko State Bank		A - 162,585	B 63,213 (1-1-15)	[10] [10] [10] [10] [10] [10] [10] [10]
Lawton: Bank of Lawton	July 14	A - 62,842	B 44,204 (1-1-15)	
Alva: Alva Security Bank	Aug. 9	A - 205,606	B 86,939 (1-1-15)	Absorbed by Central State Bank of Alva

LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

Location and name	Date of closing	Deposits1/	Loss to guaranty fund2/	Disposition
	1913 (cont.)			
Oklahoma City: Oklahoma State Bank	Aug. 11	A - 487,244	A - 61,743	Absorbed by Tradesmens State Bank
fuskogee: Union State Bank	Sept. 13	A - 226,209	A - 7,393	Absorbed by American National Bank of Muskogee
Enyder: Farmers and Merchants Bank	Sept. 16	A - 38,449	B - 13,800 (1-1-15)	succeeded by Kiowa State Bank
Nainwright: First State Bank	Oct. 16	A - 48,213	B - 15,500 (1-1-15)	Succeeded by The Farmers State Bank
Foraker: Bank of Foraker	Oct. 31	A - 10,726	B - 6,867 (1-1-15)	Liquidated
Spencer: Bank of Spencer	Dec. 16	A - 31,671	B - 21,896 (1-1-15)	Succeeded by Spencer State Bank
	1914_			
Muskogee: Peoples Bank and Trust Company	Jan. 31	A - 54,808	B - 48,758 (1-1-15)	Liquidated
Elgin: Bank of Elgin	Feb. 5	A - 17,282	B - 11,351 (1-1-15)	Reopened under same name
Alva: Bank of Commerce	Apr. 4	A - 76,638	B - 37,368 (1-1-15)	Absorbed by Central State Bank of Alva
Afton: Afton Exchange Bank	Apr. 7	A - 24,559	None	Succeeded by The Farmers State Bank of Afton
Snid: Garfield Exchange Bank	May 27	A - 257,743	A - 105,570	Succeeded by Garfield County Bank of Enid
	1915			
Coweta: Farmers & Merchants Bank	Dec. 21	A - 102,822	B - 25,000 (1-1-17)	Succeeded by First State Bank of Coweta
Mountain View: Farmers & Merchants Bank	Feb. 16	A - 67,961	B - 30,988 (1-1-17)	Succeeded by Bank of Mountain View Ci
Ponca City: Ponca State Bank	Feb. 22	A - 94,391	B - 19,179 (1-1-17)	Absorbed by Oklahoma State Bank of Ponca/
Mazie: Bank of Mazie	Mar. 24	A - 14,026	None	Liquidated through Citizens State Bank, Wagoner
Mannsville: First State Bank	Sept. 30	A - 32,340	None	Succeeded by Mannsville State Bank
	1916			
Row: First State Bank	Noy. 17	A - 40,337	<u>5</u> /	Liquidated
	1917	A - 38,026		the sale is her man Don't of Topposes
Jefferson: Farmers State Bank	Jan. 11	A - 46,972	None	Absorbed by The Bank of Jefferson Absorbed by Delaware County Bank of Jay
Jay: First State Bank	May 13	A - 40,712	None	Absorbed by Delaware County Bank of Jay
	1918	220		
Dewar: First State Bank	Apr. 10	A - 120,117	B - 10,076 (1-1-19)	
Tulsa: Citizens State Bank	May 28	A - 965,283	None	Absorbed by American National Bank of Tulsa
Tar River: Mineral Belt Bank	July 26	A - 113,575	B - 24,000 (1-1-19)	Succeeded by Cardin State Bank
	1919			
Guthrie: Logan County Bank	Jan. 31	A - 261,000	5/,	
Wilburton: Citizens Bank	Apr. 9	A - 286,000	5/ 5/ 5/ 5/	
Sentinel: Oklahoma State Bank	May 3	A - 153,000	5/,	
Hallett: First State Bank	July 15	A - 52,000	5/,	
Weatherford: Farmers State Bank	Aug. 4	C - 150,000	5/	

LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

Location and name	Date of closing	Deposits1/	Loss to guaranty fund2/	Disposition
	1920			
ones: Bank of Jones	Oct. 6	C - 180,000	5/	
ulhall: Mulhall State Bank	Oct. 11	C - 115,000	5/	
oswell: State Exchange Bank	Nov. 15	C - 383,000	5/	
palgate: Citizens State Bank	Nov. 19	C - 575,000	5/	
oss: Bank of Foss	Nov. 26	C - 191,000	5/ 5/ 5/ 5/ 5/	
allis: First Bank of Fallis	Nov. 27	C - 75,000	1	
(C. 1982년) (C. 1984년) 이 시간 (C. 1984년) (C. 1	Nov. 30	C - 498,000	917,0006/	
rietta: First State Bank			1 917,000-	
awnee: Security State Bank	Dec. 13	C -1,550,000	1	
	1921		7/	
da: Farmers State Bank7/	January	C - 246,000	c - 50,000 ⁷ /	
Lefer: Central State Bank	May 3	B - 359,000	C - 171,525	Succeeded by Security State Bank
efer: Exchange State Bank	May 3	B - 128,000	C - 109,385	Succeeded by Security State Bank
enks: Bank of Jenks	May 3	B - 173,000	C - 137,404	Succeeded by First State Bank of Jenks
ylesworth: First State Bank	July 30	B - 28,000	0 - 4,508	Liquidated(5-31-24)
ershing: Pershing State Bank	Aug. 15	B - 77,000	C - None	Succeeded by Security State Bank
iami: Miami State Bank	Aug. 15	B - 285,000	C - 91,200	Succeeded by First State Bank
ontotoc: Bank of Pontotoc	Sept. 15	B - 93,000	C - 56,470	Absorbed by Guaranty State Bank,
		20,000		Tishomingo
lbion: First State Bank	Sept. 20	B - 39,000	C - 12,880	Reopened by Albion State Bank
riftwood: Citizens State Bank	Oct. 10	B - 93,000	C - 56,973	Succeeded by Security State Bank
thrie: Oklahoma State Bank	Oct. 25	B - 839,000	C - 589,059	Succeeded by Guthrie State Bank
			Loss to	
			depositors of	
offman: First Bank of Hoffman	Oct. 25	B - 70,000	0 - 119,084	Liquidated (5-10-29)
cmulgee: Bank of Commerce	Nov. 1	B -2,065,000	C -1,039,691 (1931)	Liquidated
ilphur: Bank of Commerce	Nov. 3	B - 329,000	C - None	Reopened with same name
iss: First State Bank	Nov. 12	B - 94,000	C - None	Reopened with same name
reston: Oklahoma State Bank	Nov. 12	B - 103,000	C - 138,298	Liquidated (5-10-29)
no: Imo State Bank	Nov. 15	B - 71,000	C - 29,862	Liquidated (12-15-28)
oltry: Bank of Goltry	Nov. 16	B - 112,000	C - 78,044	Liquidated (8-13-28)
illerton: Bank of Millerton	Nov. 17	B - 40,000	C - None	Succeeded by Citizens State Bank of Millerton
elaware: Delaware State Bank	Nov. 17	B - 124,000	c - 30,956	Succeeded by First State Bank
tonewall: First State Bank	Nov. 30	B - 108,000	C - None	Reopened with same name
iami: Miami Trust & Savings Bank	Dec. 10	B - 290,000	C - 58,905	Absorbed by Ottawa County National Bar
		B - 112,000	0 - 5,795	Liquidated (6-27-30)
	Dec. 12	D - TTF 9000	U - 10/71	Lituatua tou 10-21-301
hattanooga: Chattanooga State Bank eno: Bank of Meno	Dec. 12 Dec. 20	B - 62,000	C - 40,103 (1931)	Liquidated

LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

Location and name	Date of closing	Deposits1/	Loss tog/ depositors	Disposition	
	1922				
Genefick: Farmers State Bank	Jan. 10	B - 49,000	C - 35,632	Liquidated (6-27-29)	
Guthrie: Guthrie State Bank	Jan. 11	B - 390,000	0 - 271,627(193)		
burant: First State Bank	Jan. 25	B - 235,000	C - 206,731(1931) Liquidated	
Horris: First State Bank	Jan. 27	B - 132,000	5/	Succeeded by Peoplex State Bank	
liss: First State Bank	Feb. 25	B - 52,000	C - None	Succeeded by Marland State Bank, Marlan	
l Reno: Commercial Bank	Feb. 28	B - 963,000	C - 687,803(1931	-) Liquidated	
ulphur: Bank of Commerce	Feb. 28	B - 364,000	C - 303,995(193)	.) Liquidated	
klahoma City: Wilkin-Hale Bank	Mar. 8	B = 1,666,000	C - 361,713(193)	Liquidated	
alters: Oklahoma State Bank	Mar. 10	B - 287,000	C - 106,086	Liquidated (8-15-29)	
tratford: State Bank of Stratford	Mar. 1	B - 104,000	C - 94,597	Liquidated (11-20-28)	
rick: Western State Bank	Mar. 15	B - 107,000	C - None	Liquidated (11-30-24)	
dmond: Edmond State Bank	Mar. 15	B - 143,000	C - 37,000	Liquidated (9-28-22)	
addo: Oklahoma State Bank	Mar. 18	B - 236,000	0 - 131,795(1931	Liquidated	
layton: First State Bank of Clayton	Mar. 27	B - 42,000	C - 38,085	Liquidated (6-25-29)	
ilson: Wilson State Bank	Apr. 3	B - 178,000	C - None	Succeeded by Producers State Bank	
ark Hill: Farmers State Bank	Apr. 7	B - 32,000	C - 24,037(1931) Liquidated	
artlesville: Bartlesville State Bank	May 11	B - 821,000	C - 379,095(1931) Liquidated	
ann: Peoples Bank & Trust Co.	May 18	B - 70,000	C - None	Succeeded by Bank of Wann	
ameron: Bank of Cameron	June 17	B - 42,000	C - 20,511	Liquidated (10-1-27)	
larita: First State Bank	Aug. 3	B - 156,000	C - 122,777	Liquidated (5±13-29)	
omanche: Farmers State Bank	Aug. 7	B - 194,000	C - 116,616(1931	Liquidated	
ale: Yale State Bank	Aug. 14	B - 544,000	0 - 339,569(1931		
Pawnee: Security State Bank	Aug. 14	B - 194,000	C - 132,835	Liquidated(12-5-28)	
lencoe: Farmers State Bank	Aug. 17	B - 143,000	C - 51,858(1931	Liquidated	
uskogee: Central State Bank	Aug. 18	B - 498,000	C - 359,900	Liquidated (5-9-29)	
ore: Farmers Bank of Illinois	Sept. 14	B - 47,000	C - 36,608	Liquidated (5-9-29)	
ichmond: Bank of Richmond	Sept. 18	B - 36,000	C - 30,912	Liquidated (11-1-29)	
rowder: Bank of Crowder	Oct. 6	B - 76,000	C - 60,230(193)		
hoctaw: State Bank of Choctaw	Nov. 2	B - 96,000	0 - 74,027	Liquidated (11-24-28)	
agoner: First State Bank	Dec. 21	B - 252,000	C - 149,368	Liquidated (12-15-28)	
romide: Bromide State Bank	Dec. 29	B - 70,000	C - 58,266	Liquidated (12-7-29)	
	1923				
ennings: Oklahoma State Bank	Jan. 1	B - 119,000	C - 94,894	Liquidated (5-21-30)	
oodward: Central Exchange Bank	Jan. 16	B - 466,000	C - 234,348	Succeeded by Bank of Woodward	
llen: First State Bank	Jan. 22	B - 137,000	C - 25,866	Succeeded by Depositors State Bank	
twood: First State Bank	Jan. 25	B - 49,000	C - 12,800	Succeeded by Farmers State Bank	
shland: First State Bank	Jan. 25	B - 39,000	C - 16,553	Liquidated (12-15-28)	
age: Farmers State Bank	Jan. 27	B - 230,000	C - None	Reopened with same name	
'oss: Foss State Bank	Jan. 28	B - 69,000	C - 14,471	Succeeded by Farmers State Bank	
ash: Farmers & Merchants Bank	Feb. 12	B - 165,000	C - None	Succeeded by Farmers State Bank	
chille: Guaranty State Bank	Feb. 12	B - 25,000	C - 18,61(1931)		
Sallisaw: Sallisaw Bank & Trust Co.	Feb. 19	B - 221,000	C - 38,477	Succeeded by Security State Bank	

LIST OF BANKS FAILED DURING PERIOD OF DEPOSIT GUARANTY LAW IN OKLAHOMA, 1908-1923 (continued)

- A from Report of Bank Commissioner, as of date of failure unless otherwise specified. Items included:
 Individual deposits
 Savings deposits
 Bank deposits
 Certificates of deposit
 Cashier's checks
 Certified checks
 - B from schedules submitted to Federal Reserve Committee on Branch, Group and Chain Banking.
 - C Rand McNally Bankers Directory.
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- 7/ Cooke, Quarterly Journal of Economics, November 1923, p. 112. This failure is not listed by Federal Reserve Committee; is probably the bank listed in Rand McNally, July 1920 but not January 1921, under title of Guaranty State Bank.
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- ** Cooke's figure for the amount of warrants issued in the case of the 13 banks.

For data on warrants issued and paid

On adding machine tapes run from original records in Bank Commissioner's office

See file folder with data for individual failed banks

Courses of Bank Failures in Olelahoma. Banks mentioned by Robb and Corley 2. Speculation I loans & management 2. Legestation Janath Bank - Not 1/2 Columbia Bank and Trust Company Timet State Back of Keefer, alla. Bank of Ocholatan Welshows State Bank Durant Translat transactions of officials Bank of Geory Mountain Park Frankelet Certified Justine Farmers Muchants But of Symples Greek Bank and Tenot Company Sagarfre Fewery rankond deals, torm - sete Bank of Singler Searedy State Bank of Sulphan Exercise amount playe hours Prometine personal intends Stockers Alra Security Bank Jalkan Bank J Commune alva District management anadarles State Back J anadarles Speculating progration shad loans. President's real ustale operulation Bank of Elgin Bank of Sarrin Garfilet Exchange Bank Wind Speculation paper. Speculation of officialiste. Blams State Bank of Mestage Union State Back of Grotage night and Day Bank -ablahow try. Speculat. - loans to wangement First statis Bank - .. Planters Mechanico Barle - ". Tirst State Benk Japeter Hill - " 2 Speculator & loan to management. Farmers National Bank of Tulsa 1 Cashin committed survide Cooke Farmers State Bank of Tuchker 7 met State Bank of Prigor 18 Spenfishly mentioned 1/3 paralabent gitized for FRASER ps://fraser.stlouisfed.org

loans to interests associated with the managements of the banks which failed.

The decline in the price of agricultural products and the accompanying climb in the value of real estate undoubtedly had some effect also upon bank failures in Oklahoma in 1921 and 1922. That this factor was of minor important, however, is indicated by the fact Mr. Cooke and Mr. Robb give very little attention to it in their analysis of the causes of failures in the State.

The deposit gueranty plan in Oklahoma was in operation during only two of the ten years for which the Federal Reserve Committee on Branch, Group, and Chain Banking obtained opinions from State banking authorities regarding the primary and contributing causes of suspensions. Classification of the primary and contingent causes reported to the Committee for 215 suspensions during 1921-30 is given below.

	Number	of cases
	Primary	Contingent
Decline of real estate values Losses due to unforeseen agricultural or industrial disasters such as flood, drought,		18
boll weevil, etc. Insufficient diversification or incompetent	8	37
management	52	110
Defalcation	12	32
Failure of affiliated institutions, corres-		
pondents, or large debtors	10	23
Heavy withdrawals and other causes	131	66

STATISTICAL DATA REGARDING DEPOSIT GUARANTY FUND IN Oldharan II. SUSPENDED BANKS AND RESULTS OF LIQUIDATION

22. DOGERADAD BANKO AND ABSOLIS OF BISOTIATION							
16-1	Esternated net	Number of	s suspended	Receivers' collections	Payments by receivers	or liquidating agents	
ear	loss to quaranty	banks sus-		from assets from double Total	Pd to depos- Pd to guar sitors direct anty fund	-Pd to other Expenses o	
	Lund	pended	posits of deposits banks of bks	pended each liability collections	grove driver alley I mid	tion & misc.	
			suspended suspend-	oludingcol- holders			
			ed 1/	Collections Collections Total from assets from double of bks sus liability collections pended each liability collections year 2/ (ex of stock lections from stockholders			
1908	noloss	1	36745				
1909	645,252	2	2872514				
1910	71,418	3 2 3	23149131 +108M				
1911	603,558	8	1039895				
1912	115,375 3	4 23	478083 +133m				
19/3	660,744	16	2002381				
1914	203,047	5	431030				
1915	88,760	5	297947				
1916	not stated		40337				
1917	noloss	2	84998				
1918	34,076	3	1198975				
1919	M.a.	5	876 000 (114-18)				
1920	ma.	8	1828 00 (1-1-18)				
1921	76.	24	5733000 2R				
1922		3/	821.950 7k				
	march 31)	10	1520 ON 2R				
1700(10		1					
Partie of the same	Total	126	2689000	MINISTER IN MINISTER SEE PARTIES			
To the same		12	27/31				
		129					
		REFERENCE OF					
				MORE OF THE PARTY OF THE PARTY OF			
1/ 71	aims of depositors						
igitized for ERASED Am	punts finally collected from asset	s of bankswi	nich failed in the year	s specified	agricolina a Other	of Rapa	
tps://fraser.stlouisfed.org	chude Many State Bould	met ale	which the bank of	s specified respects and res	Husbank and	Low 1912 (our)	

31 cont. First State Bank Prior and State Liverauly Bank, Walonga, for which figures are not given. Figures for State Guaranty Bank are welnded with walonga State Bank.

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IR Statistical data-

INFORMATION REGARDING FINANCIAL OPERATIONS OF THE OKLAHOMA DEPOSIT GUARANTY FUND

Cost to January 1923

The guaranty system, in its fifteen years of operation to January last, had cost the banks of Oklahoma \$3,647,486.42.

Excerpt from Cooke's article in Quarterly Journal of Economics, Nov. 1923, p. 117.

During the life of the guaranty law, from February of 1908 to March of 1923, State banks paid into the fund assessments totaling \$3,729,937; a total of \$2,195,137, was realized from liquidation of the assets of failed banks taken over by the department, and approximately \$6,000,000 was paid out to depositors.

Excerpt from Federal Reserve Bulletin, September 1925, p. 631.

Warrants outstanding and deposits unpaid

Warrants outstanding on that day (Sept. 26, 1923) were \$1,336,999.27.

Excerpt from Cook, op. cit.

In March, 1923, when the law was repealed, the assumed liabilities of the fund included interest-bearing warrants outstanding, and in addition there were the unpaid deposits in banks which became insolvent in the period from October, 1921, when the system became inoperative, to March, 1923. On the warrants outstanding no interest had been paid since their issue and the amount still outstanding in 1925 is given by the State office as \$1,330,000. The unpaid deposits totaled approximately \$6,000,000.

Excerpt from Federal Reserve Bulletin, Sept. 1925, p. 631

On February 19, 1929, the indebtedness of the fund, represented by outstending warrants, amounted to \$1,297,000.

Excerpt from Blocker, "The Guaranty of State Bank Deposits," p. 26.

The decision September 21 of this year set forth that there was \$214,057 in cash and \$149,621 in Liberty bonds and other securities in the fund and that there are outstanding and unpaid \$1,200,000 in depositors' guaranty fund warrants. It also was shown that there was available to the fund \$1,500,000 consisting of promissory notes and other frozen assets received from farious failed banks which are of doubtful value.

Excerpt from The American Banker, Oct. 23, 1934, in article regarding the State Supreme ourt decision. That decision provided for payment of warrants lowest in numerical order.

note Statements of quarenty fund Oplehama - as regard in The Oplahama Banker College Periodevered Beginning End pound sold w That They or from acceptant with 1911 - Apr. 5 & July 1 29000 33983 That 503623 (404,00) from 1911 4 1911 - July 1-Septil 33983 44237 76160 37052 1911-apr 5 to July 1 29000 33983 1411 - July 1-Sept 1 33983 44237 37052 25374 2438 25008 + Hour degentes 350 986 2 3245 settlements over 1 56383; warrants paid 57494 noticely 69109? 19 055 1412 - apr th June 30 44021 656606 33 660452 200 15841 15/31 18864 1913 quarter ending De 31 20702 liquidely 11035 [also see men] 88738 nauentspied al 1914 - quarter and of Jane 30 10770 8574 799504 Just 807475-43 33366 " " .. Jerus 5/60/ 8335 23833 & 201 men]

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SER Partly 370 in any strike I very banks, and partly from previously inspect assessment of other legal and all mentions are traded to banks, and partly from previously inspections remained for the legal and all mentions are traded to banks, and partly from previously inspections remained for the legal and all mentions are traded to banks, and partly or legislations.

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of the respective parke Banking Brand Warranton amounting to \$351,660.93, with enterest
amounting to \$8,682.95, held by State Banking Brand and pledged by State banks
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(Notes - over) Receipt (Notes - over) Via raine and page of Bank Deposit Sumently of 3 Feb 1411, p. 264	Bepositors' que	menty Ju	ind - CHLAHOMA	- as reported in	n Bank Dap	set burrante	Journal o	and The	State Bans	her	- page 1	
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3 F26 1411, p. 264 07	Thra yeur 12/31/10		818741(44)				745 115					76627
3 July 1411, pp 21-23 ay	255-July 1, 1911 V	29000	503623	84409			464846 3	25571			510	33983
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3 Cet 1911, p. 29 4 Jan 1412, p. 38	4 th 1911	44237	103078	4927			85591	45.59		847	128	61120
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5 on 1913, pp 11-12 p. 33	3 3 d g . 1913	24000	2099	28,657 166					38714	36 366		15841
6. Feb 1914, p.10	4th g. 1913	15841	57494	73335 - int. ni bel	Cones				92608	18869	The second secon	15/3/
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Be source: Ink entries from Bank Depart Guaranter Jurnal on the State Bankon, Blue entries; from Oplaham Common Common on also in applications Common V From statement of return givernor E. N. Haskel to liquidature Jan. 7,1911. of Ir adulin June had \$260,161 in special deposts, collections due counted as cash, and other "cash tems. also \$ 103,968 in amounts due hom assets of Calumbia Bank + Tust Co! sold to various parties. 3/ Excludere 244, 788 in warrents. It Includes 404, on from emergency assessment of 1/s. 16 as published in this journel 2 9,055 but from receipers and expenditives, and statement in aklahma Benter obrinsh Should be 19,055 I In opened report to State Senate by D. Lankford. Sette Bank Commission I memplete - but may include some delms prentidy regulied as expenditures in failed banks. 19 OB - Oklahowa Banken 101 Re Just statemy In perod Inday Dec. 31,1908. Collections exclude \$280.18 that had been collected from natural banks and relieved to them sender reiling of Cofe that patent and and prelique to the best of the collection of their collections of the sender of 25409 at over Deduct 18.43 water 234 257759 2342 W as given in Commerced West (New 20.1911, p. 22. Anny Deverous report. assessment recorpt also give \$ 19.741
12 Commerced West. Dec. 21,1912, p. 29. says less, cruck in bernand message to 1913 legislature with upon \$ 1.589,394 paid out to Sept 30,1911.

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2 Get 10	915, p.	9	3 dq . 1915	86.505	8046	1155	12900	558	38	71689			16/134	5/22		14628
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· CKLAHOMA - Warrant Accoun	of - Deportun Guaranty Fund - as reg	nted in banking griends	- page 1.	
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OKLAHOMA - Devaranty Jend warrents outstanding at end peach queeler - page 2.

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a large	le proportion of the	warrants	were pa	id The san	e day, and	I many otte	lux within
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collected-OKLAHOMA -Assessments NO NOT USE USE assessmente assessmente a Teles appointer State land on Whates for 1919 190 (percent) (1923 report of Common Total-endeding addition Total 1908-1923 Encluding 3/2/19 251750 198839 5/12/19 1,00 1909 (818.7413 4712793 327388 195 957123 11/17/19 285 433 ,20 578813 1 600538 12/31/19 19/12 Talytiand \$ 1681,308 1,20 2837495/ 511054 195 201825 201825 ,40 aneigne 148 0844 148 084. 1914 ,40 16/817 ,40 161817 1910 729/20 149316 6 89964 ,20 1916 5/4/20 133356 1427740 20 Total apr 1, 1918 to may 84.1920 781,599 6/30/20 222079 1208800 20 231962 268773 20 9/8/20 1920 Fust 5 ma 288,025 290748) 301658 12/29/20 3615669 ,20 1921 2467.71 12040 1920110 1982 arrage 82451 1923 1549402 Additional for unpaid debt to banks 21, 197, 150 unpaid warrant 57210 Security sold entry Lego I his represents proceeds of the initial 1 to assessment called in freventationed in 1408, Collections as given in Frist annual Regent of the State Bunking Board adjust for refunde and relates, and refundo due whenhy tempore, This figure is appropri mately the same as Roth's (pl. 74) willing what fift attributes to 1405 collecting on the herease (which appointly should have been in the later part 71908), See wer I folk's estimate including what he attributes to 1910 collected on increase (which protest should have been 1909 as lin he this was charged in 1909), angust shown here to 1910 taken as residual. The gives a 1910 figure a little Derger than Arthy Je the regular assessment I From State that published in Buch Dagmed fraventile frunch - collecting less refunds. Includes #404 from emergency assessment of 1%. Total is in research as went (with allower to refunds) with States figure which includes the opened assessment of 5 Total to end of 1412 from agrains peoport & State Senale, and amount shown here for 1912 taken as residual. This girls much bruller figure for 1912 they that I kath probably serve of incollected assessments (as law was about the be changed).

SERG Them slatements in backing prievals - figure for 1917 colors only 3 quarter, but is

front three greaters, and per good of may 31, but appropriate straight most property as straight most property as the calcular years as the amounts exceed the frames sand the first per 1900 is nearly as large. and fred in yournels of state Banking By and minutes for nine then tur go the (7 how in 1913) in any of these years - and objecting less than total collections the the in the preading your percent of average digented the fine call dates Rose proceeding year, It is assumed that affine feller became inspirition very little was collected and the not know whether the assessment was at the full mile. The collection in provey gens were apparently not all mode in the 43,765,697 less reporte learnes eta 9 118,210 13 forth, p. 74; at records of State Bankery Brand. Notes to seemed assessments collected collection & Total from federal Beserve Bulletin Sept. 1925, p. 631, and for the years 1908-1920 from the same essue preceding page, amount for 1921-1922 is difference between total to and 1922 from Horse Journal 7et 51, 1923, of \$3647, 486 less the total for the years 1908 1928, amount 7693, 400, 715. Figure for 1923 is difference between 2 Consists of \$ 1,197, 159 warrents ostetarding (Jum revide in state Suprane Court case, less #130,000 paid thereon after court decesion (for The american Banker, Cetteler 33, 19 H, plus as 1918 of seculities sold by Common with warrets not issued. The latter and most your marrante outstanding were a diversing to the quarterty fund of security deported by the participating backs as security for payment of Jetur assessments. Renote 1. But assimption that the 170 m the evering was collected in 1908 does not copin with law, and first des refers to the the Standing on one you after frist asself t

OKLAHOMA - Deposition quarty fund METHOD OF ESTIMATING COLLECTIONS FROM ASSETS OF FAILED BANKS BETWEEN Feb. 9. 1922 and settlement of fund)
(anditor's statement, Prestreet Court news here settlement of fund. # 2,194,818 Warrents outstanding 7el. 9, 1922 1,197,150 Le at time of court proceeding 997,668 Paid or cancelled between the above dates Cancelled at June 12.1922 (actumy Braid re banks that had nationally 43.51, concelled after Sept 30, 1922 - warrant 43. 395,224 9351,661 43,563 \$ 602,444 Balance - assumed paid off in cash Cash at teme of settlement (anditor's statement in District Court records) \$ 235, 419 103.697 Cash 7 1, 9, 1922 2 13 1,720 Increase in cash on Rand Jess from sale of securities deposited by burkes that had naturally of sale By burkes that had naturally of sale butthings by Seal Burking Brand May 24,1922 31.00 1011720 82,451 Less-1923 assessment in 19,269 602,444 MAK & Sum of warrants paid in cake 19.26.9 Estimated collections from 42/2 to cett, 1929 621713, the day Collections to Feb 9, 1922 - astability 2,291,461 FRASER from intirdul Bunk data 21913,174

OKLAHOMA - Depositors quaranty fund METHOD OF ESTIMATING FINAL FIGURE FOR UNPAID WARRANTS OF FUND -Warrants empaid at beginning of court proceedings All-securities sold by Commissioners with warrants not issued ordered by court & be Treated same as marrants \$1,197,150 57.218 \$ 1,254,368 Deduct assessments but and support 88,8313 (deduction ordered by Court before divident 12216) 10-1,047 1,153321 Deduct: claims of holders appealing & Supreme Court
Warrants - aguiralint (breight diponting entitled 1088,25.5 Dividend IT I to all holders

except those appealing sistemental

Full paignent to paid pur

Total for warrants paid pur

Betrief & Supreme Court 76,17.8 65056 141,234 Total warrants suspaid at time of court proceedings, including securities sold methodissely warrants (alme) 1,254,368 141.234 Paid as result & District & Sugrame Court besisins Estimated amount never paid - to be treated as forfeiture of collateral deposited for future assessments and here as equivalent participating 1,113,114

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OKLAHOMA - Deprostors quaranty freed Freme from assessmente and freeture of securities Objudinent of Stata used in menergraphing Pall Three of menigraphy rensed 3,729,937 freme - assessments to 1925 (IR Bullely for part un part states)

Adolphing fifty mattered by bucks)

Sevinities permish sold by commosin- without is so baths

women to I assured to be baths

wat nativalized show in detailed 3,729,937 1124368) - 1,113,114 last in court case records 31,000 Securities sold Jacash, Board order May 24, 1922 Thegasted by burhal that had reatinalized Angial essessments of bentes to 10,064 as condition to such setul from intensis dens)

Narrants cancelled 1922 and 1923 395,224 Hope Banks that had naturaly #351,6614 43,563 1549 402 -1124368 Told additional Total ineme from assessments (industrial filetal and unpaid 4,854,305 5,279, 339

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Olevas of 7 enbrume. 115 799, 41 Total set aside 65,055,85 mans interest of 50743.

aquelo 7870 on clasmin 50743,56 ● @ 670 simple interest = 13 years Warrants of intervenors were mostly essent on 12-11-20 a 12-13-20 Hence, 13 years would be & about 1213-33 I has is reasonable for destutute of the 7% divided was made Feb. 21. 1933, at IT wight well have been assumed that for the appeal to land decision of the state Supreme Court. Supreme Coult

Sept 11.1934 - date of Supreme Coult

Je us in would add 3/4/12 year = 4/2 % / puncipal

tos://fraser.stlouisfed.org 513

Geral Reserve Bank of St. Janie

I compound interest were figured a 6 percent for 12 years, The principal and interest would be slightly more than brubbled. I Barnett's estimate (given in a total payment of Lat 23.1934) of a total payment of La 130, on is crued with gurengel of 65.056

OKLAHOMA - Dipoloro quaranty fund Ireme and expenditives as renach as given in for use in Opluline memlogapher study - and correction (as renord) Part Talk in Annual Gegras proof) 1956 Annual Aggrit 1549 402 Income 3,730 assessmente - 1/925 1124 Additional marray to fresh the construction of the contract of 5219339 4854 23729 5,303,068 4854 Total Expenditures Deposts part from find 7.644,284

Of District Court dissin 23027

Delud: reweres by for 7667,311

2,9131.74 4754137 5353 304.016 Interest and losses (interest 252 252,261 5,310,414 Operating expenses 56 05 V See holes on there cases with decision to enclude # 23027, Gd to desire and etems for which the 77 durided would be 6613. Old note Delaw made before procedure was finally unsked out.

I all claim allowed are encluded.

The thing of the procedure was finally unsked out.

The thing of the procedure was finally unsked out.

The thing of the procedure was finally unsked out.

The thing of the procedure was finally unsked out. Tot 7 % of claims after than warrants, amounting to 37501.50 906 299. Whither adjustment should be made in doubtful - expecially what accompanying objection adjustment of the made. Should estimate deposits at thing surspansin be industrially adjusted for FRASER for firstly from assets be decreased? Should estimate this to deposition be positively from assets be decreased? Should estimate this to deposition be surely for each bank. I want be some by banks with decreases at these questions total Reserve Bank of St. Louis

3 d quarter 1913 3 d quarter 1913 4th 1916 2 d 1916 2 d 1916 2 d 1917 3 d 1917 4th 1917 4th 1917 4th 1917	ear 1575 166. 3168 822 611 807 986 1039 1863 4414	Level on hand of the service of the	253349 76627 29 0-10 33 983 44 23 7 61 120 19 055 44021 44021 44021 44021 44021 15131 10970 2574 2016! 44714 17814 86505 14628 77703 101334 65161 110 664 153738 130350 152845 177430
Estimate of interest reclined Total from data solitained To Dev 31, 1908 To Dev 31, 1908 To Dev 31, 1908 To Dev 31, 1908 Themseloso, 1910 to Dec, 30, 1915 Themseloso, 1910 to Dec, 30, 1915 Themseloso, 1910 to Dec, 30, 1915 The standard AT 370 pergency array belong 5 494 (asterated AT 370 pergency array belong 4, 3650) 2980 Year 1916 (mth 1st quarter asternated AT 896, 4984 When 1917 (mth 1st quarter asternated AT 896, 4984 If 1918-1920 - as above play 4, 3034 May 31, 1920 & June 1, 1921 - assumed 4 37, of array of beginn soul forward 1918-1921 - assumed none 4 23729	7017	Jec. 31 " mar 31, 1918 Jen. 30 " Sept 30 " Dec 31 " mar 31, 1919 Jane 30 " Sept 30 " Mar 31, 1920 Mar 31, 1920 Jane 1, 1921 Fet 9, 1922 USE 1 1431 21 La Probably No. 13/108 must include 13/108 must includ	Ed in 1909,

OKLAHOMA - Depositors quaranty Jund Iterest paid by Jund on warrants (sentilin available \$ 847 4th quarter 1098 1913 366 18864 1913 1913 2974 1914 5122 42665 4th . 1915 157 .. 1905 3rd . 37481 1916 3624 45063 19/6 1916 593) 1916 400 1917 3349 1917 8187 18042 Sith the date are avoitable 1917 apr 1,1918 to May 31,1920 June 1/921 To 7 L. 9, 1922 145564 I olal pery data obtained Estimated for years 1911- mid-1920 Jem marrante outstanding at and I each quarter - at 1270 year question 234963 possignantina 64,944 Combin lid 33, 1934) at dainsy

Both perture sont of 65056 Add June 1, 1921 to 7 et 9.1922 (no interest paid because of atystim) igitized for FRASER lance with Such Supreme Country
tps://fraser.stouisted.org. hollers Jearled essue inavanta916

777.03 1.013.34 1.013.34 651.61 651.61 1.106.64 6.64 1.106.64 1.537.38 8/7.857.59 H

98220 - 2,947 peryan

6.50 8.22 6.11 8.07

24000 158.41 865.05 146 1,0133 651.6 1.1066 1.106.64 1,537.38 37.38 1.303.5 1.58845 1.774.30 1,77430 355.60 2 16399241 81.9,962 approximately I terest received during the nine 7168 .874 % 3496 igitized for FRASER tos://fraser.stlouisfed.org

383.14 4628 388.51 30 quarters [7.288.33 H Estimated ordered to per squar = 1570 95474

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ederal Reserve Bank of St. Louis

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OKLAHOMA -12 Banks - for which depositors (or others) submitted claims · to District Court that were approved for find Burked Stirident and assumed & have been paid 7 percent,

There cessation of issue I warrants

Supulpa - Farmers & Merchants Bank - Closed 9-10-12

Supulpa - Farmers & Merchants Bank evold be \$1378 Weatherful - Farmers State Back - almed 8-4-19 Dains 3.000 7% divided would be 9210 Note re revision. To add the estimated 7th dindered to the amounts shown in the bank-by-bank worksheet would require, for consisting, showing the 93% balance of these claims as quaranteel begins and sunpaid, This maybe right - but since amounte are within margin yerror of estimated quaranteed deposits recovered, atthe security would really not be superiod would look strange.

Jigure of guaranteed begands hoppind would look strange.

Flete must, James, have been in fast other guaranteed

Plete must, James Plack of filing of daines which

sports impact because of lack of filing the astimates. Buthril - Oklahma State Back - closed \$10 - 25-213 is 29 to Claims - degents 24,208. 142 038 Theinderfund be 12485 and prior - degts 17,830 16 by the greatesty find prior This was the last bank herseled by the quarenty fund prior to less the last bank herseled by the quarents were assumed in full lay Enthalt State Bank, which failed a few months tate Jan 11. 1922.

The above dains of 442 038 could be either (a) additions deposition of the prior full by Butterth State Dame, which wither (a) additions despited on (b)
The above dained of 442038 cried be either the successification by
daines discovered ovagand as valid - after the successification by
daines assumed by the successor bank but not for the deposition of the fund of the successor of the successor of the successor of the successification of the su

However, the estimated amount of the 7% denderd sean in receivery be added as a payment from the fund, with no receivery by the fund, and before the same amount state subtracted from the lass to despitors of the buttered State subtracted from the lass to despitors of the buttered State Sank -failed 1-11-22. This world be treating it as a Group III case (see page 30f clase notice)

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12 Banks - for which deposition (or others) submitted daims to District Court that were approved for find divided and assumed to have been paid 7 percent. · OKLAHOMA II. Banks closed ofter repealed the law. Bustone - First Stale Bank - dred 1-10-24 Claims \$1,120 7% birderd would be \$78 Kiefer - Sewilly State Back - closed 3-24-24 Claims \$ 47,836 77. Livider f would be \$3349 There is no explanation of orbig these claims were appeared by
the Court. To treat them as lighted paid by the found entirely
the Court. To treat them as lighted in the Krefer case may be
inted Jork strange. The claims in the Krefer case may be
inted Jork strange. The claims in the boulest the case is the
for deposite assumed from predecison boulest 5-3-21. It is is the
orthe Exchange Statisticals - both of the Butturel case (see page)
or the Exchange Statisticals is similar to the Butturel case (see page) 9 these notes assumption (b) are we firm the SR odelular, and
generally might be mistakes from 5/ issue of warrants and ores

Concernably might be mistakes from 5/ issue of warrants and ores

repeal of the law Hoffman First Berk J Hoffman - closed 10-25-21 Valaine #129,182 770 bindert would be # 9048 Openulgel - Bank of Commerce - Losed 11-1-21 claims #138,339 770 dinders would be #9684 Oklehma City - Willsin - Hale Bark-dosed 3-8-22 Vatters - Oplahma Stato Bark - closed 3-10-22
Vagton - First Stato to 10 Ab wild be #259 Clayton - First State Book / Clayton - dosed 3-27-22 Camera - Bank J Camera - closed 6-17-22 Claims #3237 770 divident would be

TI cases. However, this treatment appears bubines because remaining hata for these banks are not encluded in talulations.

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Barbos - Je which suprostors or other pubmitted claims to District Court that evere approved for Jind Binder and cosserved to have been paid 7 percent ·OKLAHOMA For these sex cases the deposts should be assumed to be included in those telulated the ables as payments amonth the 7% divided should be abled as payments TT - continued from the fund, with no receivery by the fund, and hence the same amount subtracted from the loss to depositors. IV. Bank with late of closing unknown Ordnor- american Bank of Trust Co. Quim (not a deposit) 922823 77 birderd world be 4598 This bank does not appear on our records to banks operating.

This bank does not appear have been a bank closed earlier.

This bank does not appear have been a bank closed earlier.

But other, and the kind of claim- at how originally are unknown. Disregular Sepulpa, Weatherful, and ardmore cases? [5777, of 866 13

Disregular Briston as indicated above for Group III, allocated

Treat other cases as indicated above for June 11. Docisim regarding treatment to years as follows: in add to deports paid by quanty Jund and subtract from loss! as 1921 cases as 1902 cases Okmalgel 234 Suthril Oplahma City 259 Watters 637 Clayton 227 Carrero 18727 4300 gitized for FRASER tps://fraser.stlouisfed.org 23027

granty fund Depositors

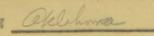
Paranty fund try at and

Navierto thistoriting at and

Jeach quarter ad 1911 to mar 1919 884 00.6 2.1 36.1 12.8 1.4500 97.0 4.3 4.8 334 15 6 088 6 6.961.5 1 10.7 8.189.5 7.6 868 548 6 6 9 4.7 75 7 68000 567.8 6373.2 63399 6.663.7 64101 472.7 5.357.1 3,899.36 3.879 9 1,435.2 1,375.5 1.3696 1,6182 156641.59 m Interne 12/2 156642 23 49 6 3 Digitized for FRASER

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ederal Reserve Bank of St. Louis



Year	Cash Warrent	Balance in		Accumula-	Assess-	Estimated	
Dec. 31	balance indebtedness !	fund (income	ments levied certifi- but not yet cates or	tion or deficit	ments probably	value of unliqui-	net accu- mulation
	District Control of the Control of t	minus	collected claims	in fund	not	dated	or deficit
		expenses	outstand-	(sum of	collect-	assets of	in fund
		paid to	ing	preced- ing three	able		(sum of preceding
		acco)	Town the state of	columns)		(share of	three
						fund)	columns)
19.08							
1909							
1910							
1911							
1917							
1913							
1914	91 44,713.72 \$ 768,681.99						
1913							
1916	\$153,738.23 \$ 666,378.51						
1917							
1918	45,690.75 *136,961.19						
1919							
1920							
1921							
1922							
mar 1, 1920	75,000,00					\$5000	exon, on as Jearly 1921 (Roth)
Assessment 19212	275, avt. or aggreg.						1400,000 as 1/ eng/921 (1000)
19223							3350 on define
Date Inpul3							3350 on deficit 7500 oor approx (reduced smarket)
				100			Jan and
1) Bie	ennial Reports of Bank Commisses	iner (see of	wohnt w shut for rece	ijsto o guar	arty fund.		
21 RO	of Burety of Bank Degrets p.	106.					
igitized for FRASER 3 E	of b. Burety of Bank Degrets, p.	inkers aspe	centra, The languarty	of Bank De	exposits, p. 1	2.	
tps://fraser.stlouisfed.org		1 21 5 6 5 E S A			STREET IE		

Estimate of obligations in ime and not accumulate on definit of obligations depositors guaranty fund.

1	Bosomentes	Final las	accumulation	Regented
	ineme	net payments	or deficit as	or defeat
	thrusands)	in failed banks	estimate for preceding column	m,
1908	199	_	199 .	
1909	327	645	-119	
1910	289	232	-64	
	601	604	-67	
1917	511	115	+329	
1913	202	661	-130	-365 (400 ranot
1914	148	203	-185	-724 lasts-cal
1915	162	75	-98	
1916	90	?	-8	-5/2 (666 W)
1917	133		+125	
. 1918	209	34	+300	-9/ (137 W/
1919	232		. ,	na1,1920 +75
1928	302			, , , , , ,
1921	732	1229		
1922	5			
	3730			

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Computation of estimated note of assessment met losges to depositore in all spilled banks, aggregate I gearly deposits in State banks \$1,202,126, ors To 15 genes, 1908-1922 (call later reacest Jan 1)

Aggregate I george deposits in natural banks,

same person \$ 3,3 09,457,000 Estimated losses & gustarty find, narrant holders and depositors in State benks field from \$10,570,000 Feb. 1908 & Merch 31, 1923 Estimated losses in national banks failed in 1.363,00 (see attachet sheet) \$11,933,000 . 3.66 percent Rates of losses & dignits in active backs Note amount forcesoment collected from State banks.
Ratio of collections to deposits in active State banks 43,730,00 . 310 percent

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Prepared in 1942
Prepared in 1942
Permitten in 1958
Attan collecting
Additional material
in Oklahoma City

DEPOSIT GUARANTY IN OKLAHOMA

by

Clark Warburton, Principal Economist Division of Research and Statistics Federal Deposit Insurance Corporation

FOREWORD

This report on deposit guaranty in Oklahoma, 1908-1923, prepared by Clark Warburton, is the first of a projected group of reports on the character and operation of deposit guaranty systems in various States prior to the adoption of Federal deposit insurance. A study of the previous systems of deposit guaranty in the United States was undertaken in the belief that a knowledge of the character and operation of those systems would be helpful in the formulation of policies contributing to the success of deposit insurance.

In collecting data for the report, Mr. Warburton has been assisted by Mrs. Ethel Bastedo and other members of the clerical and statistical staff of the Division. He has also had the advice and criticism of other members of the Staff of the Division in the preparation of the report.

Donald S. Thompson, Chief Division of Research and Statistics Federal Deposit Insurance Corporation

January 15, 1942

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DEPOSIT GUARANTY IN OKLAHOMA

The Oklahoma law for the guaranty of deposits was approved

December 17, 1907, at the first session of the Legislature after admission
of Oklahoma into the Federal Union as a State. The law became effective

February 14, 1908, and continued in full operation for 13 years. In 1921,
when the liabilities of the fund exceeded its receipts, the law became
inoperative with respect to protection of depositors in closed, banks, but
the liability of the banks for payment of assessments continued until the
repeal of the law in 1923. The affairs of the fund were not fully settled
until 1934.

Eight States established deposit guaranty funds during the period 1907-1917. Oklahoma was the first of these States, and is generally regarded as the pioneer in the movement to provide safety for bank deposits through application of the insurance principle. In fact, however, several States had established guaranty funds for bank obligations, or had provided for the mutual guaranty of such obligations, during the preceding century. When the Oklahoma law was enacted, forty years had elapsed since these plans had been in operation, and very little was known about their character or the success of their operations.

^{1/} The States other than Oklahoma were Kansas, Nebraska, and Texas in 1909; Mississippi in 1914; South Dakota in 1915; and North Dakota and Washington in 1917.

^{2/} New York in 1829; Vermont in 1831; Indiana in 1834; Michigan in 1836; Ohio in 1845; Iowa in 1858, All debts of the banks were covered in Vermont, Indiana, and Michigan; only circulating notes were covered in Ohio and Iowa. In New York all debts of the banks were covered from 1829 to 1842 and only circulating notes thereafter.

CHARACTER OF THE GUARANTY LEGISLATION1

Admission of banks. Participation in the deposit guaranty plan was made compulsory for all banks and trust companies operating under a State charter in Oklahoma. At the same time, private banks, which had been permitted to operate in the Indian Territory part of the State, were required to incorporate. Under a ruling of the attorney general the guaranty became effective immediately upon the levy of the first assessment, which was required to be made within 60 days after passage of the law.

Approximately 475 banks, excluding national banks, were operating in Oklahoma at the time the deposit guaranty law was enacted. Of these, 294 were located in the former Oklahoma Territory, and the remainder in the former Indian Territory. Banks in Oklahoma Territory had been subject to examination by the Territorial Bank Commissioner for a decade, but banks in the Indian Territory had never been subject to examination or supervision.

The guaranty law in Oklahoma also provided that any national bank in the State might voluntarily come under the protection of the depositors' guaranty fund with the approval of the Bank Commissioner. The Attorney-General of the United States in July 1908 ruled that national banks could not legally participate in a State system of deposit guaranty.

^{1/} The banking laws of Oklahoma were codified, revised and reenacted on May 25, 1908. The guaranty law was not substantially modified at that time, and the description of its provisions given here is based on the revised banking code.

In 1911 the law was amended to exclude from the fund, after September 1 of that year, corporations doing a trust business. This change excluded only two institutions, holding about one per cent of the aggregate deposits previously covered by the guaranty.

Deposits guaranteed. Deposit guaranty in Oklahoma originally covered all deposits, the law providing that the State Banking Board should draw from the depositors' guaranty fund whatever amount, in addition to the cash which could be made immediately available in a failed bank, was necessary to meet the deposits of the bank.

In 1913 deposits otherwise secured, and deposits on which a greater rate of interest was paid than was authorized by the Bank Commissioner, were excluded from the protection of the fund. The application of the guaranty to certain secured deposits was also limited by a decision of the State Supreme Court in 1917. This decision referred to moneys belonging to the permanent school fund deposited in a bank which became insolvent in 1909. The assets of the bank were insufficient to pay the general depositors, and the court ruled that the school fund deposit was not entitled to protection by the depositors' guaranty fund, since the statute provided a specific system for the protection of the school fund. The court also ruled that the school fund deposit was not entitled to share in the assets of the institution. 2/

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^{1/} One of these two trust companies relinquished its trust company charter and became a State bank, thus coming back under the guaranty system, about eighteen months later; the other consolidated with a national bank in 1914.

⁶⁷ Okla. 14, 168 Pac. 234.

Two years after the statutory exemption of deposits otherwise secured, an amendment to the law provided that surety companies paying a deposit of public funds for which they were liable in a failed bank were entitled to a pro-rata share with the depositors' guaranty fund in the proceeds of the assets of such failed banks. This amendment, however, was declared void by the State Supreme Court.

These decisions did not reduce the protection afforded school or other public funds, but prevented surety companies from recouping, out of the guaranty fund or the assets of closed banks, any part of their losses in Oklahoma banks.

Assessments. The original deposit guaranty law in Oklahoma provided for an initial assessment of 1 percent of average daily deposits, excluding United States and State funds if otherwise secured, during the year preceding the first call by the State Banking Board. Annual assessments, using the same method of computation, were to be made on the growth of deposits. If the fund became depleted, it became the duty of the State Banking Board to levy a special assessment sufficient to restore the fund to 1 percent of average daily deposits, excluding United States and State funds.

In 1909, about a year after the initial assessment was levied, the assessment provisions were revised. The new law provided for the accumulation of a fund amounting to 5 percent of average daily deposits

^{1/} State ex rel. Short, Atty. Gen. v. Johnson et al. (1923) 90 Okla. 21. The ground on which this decision was made was a technicality, namely, that the preference right of the depositors' guaranty fund against the assets of a failed bank had been impaired, and that this was not expressed in the title of the amendatory act.

^{2/} No provision was made for refund if the deposits of a bank decreased.

through an assessment payable in annual instalments of one-twentieth of 1 percent of average daily deposits (modified in 1911 to annual assessments at this rate) with a credit for the initial assessment already paid. Each bank was also required, once a year, to make such additional payment as was necessary to adjust its total payments into the fund in proportion to any growth in its deposits. Special assessments for restoration of the fund when reduced by payments to depositors of closed banks were limited to 2 percent in any calendar year. All assessments were computed on the basis of average daily deposits during a period of a year, the deduction for United States and State funds being eliminated.

Further changes in assessments were made in 1913, following two years in which the total assessments averaged over 1 percent of deposits per year. The regular annual assessments were raised to one-fifth of 1 percent of average daily deposits, and the maximum fund to be accumulated was reduced to 2 percent of deposits. Assessments for restoration of the fund, when reduced below 2 percent of average daily deposits, were limited to one-fifth of 1 percent in any year. Also, special assessments not exceeding one-fifth of 1 percent each year were expressly authorized during the following three years and forbidden thereafter. These provisions remained in force during the subsequent duration of the fund.

The 1913 amendment to the guaranty law also provided for the posting with the State Banking Board, by each bank, of State or local government obligations approved by the Board in an amount not less than 1 percent of average daily deposits, with a minimum of \$500, as security

^{1/} The regular and special assessments in 1911 amounted to 1.2 percent of deposits, and in 1912 to .95 percent of deposits.

for the payment of assessments.

A problem of collecting the assessment arose from the conversion of State banks to national banks. Under a State Supreme Court decision in 1915 a bank subject to the law of 1909 which had become a national bank was liable for the full 5 percent assessment, payable in accordance with the instalment payments imposed by that law. The court held that the State bank, though it had ceased to exist as a State corporation, did not thereby escape liabilities incurred by it during its continuance as a State bank. The effect of this decision was neither to mature nor discharge the deferred payments of the assessment. This decision, however, was reversed four years later, when the Court decided that the bank was liable only for such payments as matured or were payable while it was doing business as a State bank. 2/

Banks organized subsequent to the enactment of the deposit guaranty law, excluding those formed by reorganization or consolidation of banks subject to the law, were required to pay into the fund at the time of opening for business 3 percent of the amount of their capital stock. This payment was a credit fund, subject to adjustment on the basis of deposits at the end of one year. This provision was retained throughout the entire period of the law's existence.

Administration and custody of the fund. Supervision and management of the depositors' guaranty fund in Oklahoma were placed in the State

^{1/} State ex rel. West, Atty. Gen. v. Farmers' National Bank of Cushing (1915) 47 Okla. 667, 150 Pac. 212.

Z/ Citizens National Bank of Broken Arrow v. State ex rel. Freeling, Atty. Gen. (1919) 76 Okla. 94, 184 Pac. 63.

Banking Board, composed of the Governor, Lieutenant Governor, the President of the Board of Agriculture, State Treasurer, and State Auditor.

This Board was empowered to adopt all suitable rules and regulations not inconsistent with law for the management and administration of the fund. In 1911 the composition of the State Banking Board was altered to consist of the Governor and two other members appointed by the Governor, with the approval of the Senate, to be remunerated on a per diem plus expenses basis. The Bank Commissioner was made ex officio secretary of the State Banking Board.

again changed. After that date the Board was composed of the Bank Commissioner as ex officio chairman and three members appointed by the Governor. The Commissioner was appointed by the Governor from a panel of three persons, and the other members from a panel of nine persons, recommended by the executive council of the State Bankers Association, an association consisting of a representative selected by the board of directors of each bank. After two years' experience with this method of appointment, the recommendation of persons for Commissioner by the State Bankers Association was dropped, and the Commissioner was appointed by the Governor.

The original law contained no provision regarding investment of the guaranty fund, but in 1909 provision was made for the investment of 75 percent of the guaranty fund in State warrants or such other securities as were specified for State funds. Two years later, after a large part of the fund kept in cash had been tied up by the failure of the bank in

ligitized for FRASER ttps://fraser.stlouisfed.org which it was deposited, the law was amended to provide for the re-deposit of the entire fund in the respective banks, according to the amounts of their assessments, the banks issuing to the Bank Commissioner certificates of deposit bearing 4 percent interest. In 1913 the law was again amended to provide for the payment of the assessment in the form of cashier's checks to be held by the State Banking Board until it was necessary to collect them. Such cashiers' checks were to bear no interest. The requirement of deposit of securities as surety for the payment of assessments, adopted at this time, has been mentioned above.

Indebtedness of guaranty fund. The original law contained no provision against the contingency that the assessments collected might be inadequate to pay all of the deposits in closed banks, other than the provision for such additional assessments as might be needed. In 1909, when a maximum was placed upon the special assessments which could be levied in any one year, the State Banking Board was authorized, in the event that the assessments were insufficient to meet the claims of depositors in failed banks, to issue certificates of indebtedness bearing 6 percent interest to the depositors. Such certificates were to be consecutively numbered and to be paid by the State Banking Board as soon as possible in the order in which they had been issued.

The foregoing provisions were in effect until 1913, when they were replaced by a method of borrowing designed to provide immediate cash with which the guaranty fund could pay the depositors of failed banks. The State Banking Board was authorized to issue "Depositors' Guaranty Fund Warrants," bearing 6 percent interest, which could be disposed of at not

less than par value. These warrants were given a first lien upon future receipts of the guaranty fund from assessments or from the proceeds of liquidation of failed banks, and were to be retired in order of issue. The warrants were made non-taxable; and were authorized as investments of trust funds and as collateral required to be deposited for the security of public funds. Any bank, trust company, building and loan association, or insurance company was authorized to purchase the warrants to the extent of its capital and surplus. In 1915 the investment of a bank in such warrants was limited to its surplus and 10 percent of its capital stock.

Method of paying depositors and of liquidating failed banks.

Depositors in a failed bank were to be paid by the State Banking Board in cash when the Bank Commissioner took possession of the bank. From 1909 to 1913, as has been indicated, the Board issued certificates of indebtedness to the depositors if the amount in the fund was insufficient. After 1913, the Board was authorized to sell warrants and use the proceeds therefrom to make immediate payment to the depositors.

The State was given a first lien, for the benefit of the depositors' guaranty fund, upon the assets of any failed bank, including the personal liabilities of stockholders, officers, directors or other persons to the bank. In 1909 an amendment to the law provided that the funds realized by the Bank Commissioner from the assets of a failed bank should first be applied to the expenses of liquidation, then to payment to the depositors' guaranty fund of all money paid by that fund to depositors of the bank concerned, then to the refunding of any emergency assessments levied upon the guaranteed banks.

Expenses of administration. Expenses incurred by the State Banking Board in administering the depositors' guaranty fund were paid by the Board from the proceeds of examination fees levied upon the banks for each examination made. Under the 1908 law the Bank Commissioner's salary and other expenses of his office were also to be paid from the proceeds of the examination fees. However, in 1913 the salaries of the Commissioner and of 12 assistants were made payable from the general revenue fund of the State.

CONSTITUTIONALITY OF THE DEPOSIT GUARANTY LAW

Bankers objected to the deposit guaranty law in Oklahoma, and a test of the constitutionality of the law was made by the Noble State Bank. This Bank asked the district court of Logan County for an injunction restraining the levy of the first assessment by the State Banking Board.

The Noble State Bank contended that the guaranty law was in conflict with several sections of the Constitution of the State of Oklahoma, for the following reasons: 1/

- 1. That the law deprived the bank of the enjoyment of the gains of its own industry for the benefit of depositors of other banks in which the plaintiff had no interest.
- 2. That the law deprived the bank of its property without due process of law.

^{1/} It was claimed that the law violated the following sections of the State Constitution: (1) Sec. 2, Art. 2; (2) Sec. 7, Art. 2; (3) Sec. 15, Art. 2; (4) Sec. 23, Art. 2; (5) Sec. 24, Art. 2; (6) Sec. 57, Art. 5; (7) Sec. 8, Art. 10; (8) Sec. 9, Art. 10; (9) Sec. 14, Art. 10; and (10) Sec. 1, Art. 14.

- 3. That the law violated the contract between the bank and the State of Oklahoma, evidenced by its charter, patent, and certificate of authority.
- 4. That the property of the bank was taken for private use without compensation and against the consent of the bank.
- 5. That, if it be held that the property was taken for public use, then it was taken without compensation and not in accordance with the form prescribed.
 - 6. That the law embraced more than one subject.
- 7. That, if the law be construed as levying a tax, this tax was assessed upon an arbitrary basis without regard to the fair cash value of the property assessed.
- 8. That, if the law be construed as levying a tax, this tax exceeded the maximum permitted.
- 9. That, if the law be construed as levying a tax, this tax was levied for private purposes rather than public use.
- 10. That the deposit guaranty law did not provide for the protection of individual stockholders in the bank.

The Noble State Bank also contended that the depositors' guaranty fund law violated the Constitution of the United States: (1) by impairing the obligation of the contract between the bank and the State of Oklahoma as evidenced by its articles of incorporation, patent, and certificate of authority; and (2) by depriving the bank of its property without due process of the law, denying to it equal protection of the law. 1/

^{1/} It was claimed that the law violated the following sections of the Constitution of the United States: (1) Sec. 10, Art. 1; (2) Fourteenth Amendment.

Decisions of the State courts. The district court of Logan County refused to grant the injunction requested by the Noble State Bank. The Bank appealed the case to the Oklahoma Supreme Court, which upheld the decision of the lower court.

The State Supreme Court, in a lengthy opinion, maintained the point of view illustrated by the following quotation:

Banks are chartered by the state, not with the paramount view of enabling the stockholders to make investments and derive profits therefrom, but to meet a public necessity. The stockholders, having made investments therein, should be protected, but private interest must always be subordinated by the state, in the reasonable exercise of its police power, to the public welfare or good. With the view that the depositor, as well as the stockholder, and the general public with an incidental interest therein, may be protected, banking is regulated, and limitations, restraints, and requirements are imposed. The imposition of double liability upon the stockholders; the requirement of reserve funds, stipulations as to what capital stock cannot be invested in; prescribed qualifications of the directors--all these having been tried, in the judgment of the Legislature the further restriction that active officers should not borrow from the bank without incurring pains and penalties was deemed salutary. In addition to further and more completely protect the depositors, the depositors' guaranty fund is created, the Legislature acting pursuant to the mandatory declaration of the Constitution

Decision of the United States Supreme Court. The Noble State
Bank was dissatisfied with the decision of the Oklahoma Supreme Court
and appealed to the United States Supreme Court. While the case was
pending, similar cases came before the United States Supreme Court regarding deposit guaranty laws in Nebraska and Kansas, on appeals from decisions of the Nebraska Supreme Court and the Circuit Court of the United
States for the District of Kansas, respectively.

^{1/} Supreme Court of Oklahoma, Noble State Bank v. Haskell et al., 22 Okla. 48, 97 Pac. 590, No. 83. Opinion filed September 11, 1909.

The United States Supreme Court heard the arguments regarding the three cases at its fall term in 1910. On January 3, 1911, the Court rendered its decision on the Oklahoma case, which was also applicable to the Nebraska and Kansas cases.

The principal point in the cases considered by the United States Supreme Court was the contention that the deposit guaranty laws took the private property of one bank for the private use of another bank without compensation. That this might be the case was admitted by the Court, but the decision pointed out that such transfers of property are constitutional if there is sufficient purpose and necessity.

... It is established by a series of cases that an ulterior public advantage may justify a comparatively insignificant taking of private property for what, in its immediate purpose, is a private use... There may be other cases besides the everyday one of taxation, in which the share to each party in the benefit of a scheme of mutual protection is sufficient compensation for the correlative burden that it is compelled to assume... At least, if we have a case within the reasonable exercise of the police power as above explained, no more need be said.

The Court discussed the application of police power to the guaranty of bank deposits as follows:

The levy and collection, under a State statute, from every bank existing under the State laws, of an assessment based upon average daily deposits, for the purpose of creating a depositors' guaranty fund to secure the full repayment of deposits in case any such bank becomes insolvent, is a valid exercise of the police power, and cannot be regarded as depriving a solvent bank of its liberty or property without due process of law... The police power of a State extends to the regulation of the banking business, and even to its prohibition, except on such conditions as the State may prescribe.

It may be said in a general way that the police power extends to all the great public needs. It may be put forth in aid of what is sanctioned by usage, or held by the prevailing morality or strong and preponderant opinion to be greatly and immediately

^{1/} Noble State Bank v. Haskell, (1911) 219 U.S. 112.

necessary to the public welfare. Among matters of that sort probably few would doubt that both usage and preponderant opinion give their sanction to enforcing the primary conditions of successful commerce. One of those conditions at the present time is the possibility of payment by checks drawn against bank deposits, to such an extent do checks replace currency in daily business. If then the legislature of the State thinks that the public welfare requires the measure under consideration, analogy and principle are in favor of the power to enact it. Even the primary object of the required assessment is not a private benefit as it was in the cases above cited of a ditch for irrigation or a railway to a mine, but it is to make the currency of checks secure, and by the same stroke to make safe the almost compulsory resort of depositors to banks as the only available means for keeping money on hand.

This decision is notable not only because it affirmed the constitutionality of the deposit guaranty legislation, but also because of the grounds on which that affirmation was made. The decision is based on the ground that safety of payments made by check is one of the primary conditions of successful commerce, that the police power covers any regulations necessary to make the currency of checks secure, and to make safe the money kept on hand by depositors in the form of bank deposits. The decision thus rests wholly on the idea that the purpose of the legislation is the protection of the circulating media.

The problem of the constitutionality of a deposit guaranty or insurance plan designed primarily to protect the invested savings of individuals was not considered by the Supreme Court in this case. The Court neither asserted nor implied that assessments upon one bank for the purpose of protecting interest-bearing deposits, or other deposits not subject to check, are constitutional, except as such protection may be incidental to the protection of deposits which are part of the circulating media.

^{1/} Noble State Bank v. Haskell, 219 U.S. 104, 111-12.

SUPERVISION AND REGULATION OF GUARANTEED BANKS1/

Supervisory authority. The deposit guaranty law in Oklahoma was enacted almost immediately after the admission of Oklahoma into the Federal Union as a State. At that time banks in the former Oklahoma Territory, comprising the eastern part of the new State, had been subject to examination by the Territorial Bank Commissioner for about ten years. Banks in the former Indian Territory, comprising the western part of the State, operated as private banks or with charters obtained under the general incorporation law of Arkansas, which had been extended to the Indian Territory by Act of Congress. However, neither the private nor the incorporated banks were examined or supervised.

The Oklahoma banking code adopted in 1907 and 1908, at the time of enactment of the deposit guaranty law, provided for the appointment of a State Banking Board and of a Bank Commissioner. The State Banking Board was given no duties other than administration of the deposit guaranty law. The Bank Commissioner was charged with the following duties: certification of compliance with the law by persons organizing new banks and authorization of such banks to open for business, examination of all State-chartered banks and trust companies and of national banks if they should apply for the benefits of deposit guaranty, reporting of violations of law to enforcement authorities, handling of banks closed because of insolvency or for violations of law, and other duties, such as obtaining reports of condition, associated with bank supervision.

Under the 1908 law the Bank Commissioner was appointed by the Governor, with the advice and consent of the Senate, for a term of four

^{1/} The deposit guaranty law as enacted December 17, 1907, contained several amendments to the old banking laws of Oklahoma Territory, and further amendments were made in February 1908. The banking laws of the State were codified, revised and re-enacted on May 25, 1908. References given here to the banking laws at the time of inauguration of deposit guaranty, or to the 1908 law, are based on the revised banking code.

years. The Bank Commissioner must have had, prior to appointment, at least three years' practical experience as a banker, but at the time of appointment could not be an officer or employee of any bank or any person interested as an owner or stockholder of a bank. In 1911 the Bank Commissioner was made ex officio secretary of the Board. Two years later the Bank Commissioner was made ex officio chairman of the State Banking Board, the practical banking experience required of the person appointed was raised to five years, and the appointment was required to be made from a panel of three persons named by the State Bankers Association. The last of these provisions was dropped after two years.

Examination of banks for admission to guaranty. The first task of the State Banking Board and the Bank Commissioner after enactment of the deposit guaranty law was to examine all banks in the State, other than national banks, before the deposit guaranty law should become effective. The Commissioner did not have sufficient examiners to make these examinations, particularly in view of the fact that the banks in the former Indian Territory had not previously been examined. A special force of 31 examiners selected from among bankers in the State was employed and 513 examinations were made within a period of a month.

The Bank Commissioner, in his report for 1908, states that those banks whose condition or past record did not justify a continuation of business were ordered to discontinue receiving deposits and to liquidate, and that they did so. However, no record is available of the number of banks which failed to meet the standards which were required by the Commissioner and the State Banking Board for continuance in business and admission to guaranty.

The examinations appear to have been inadequate. They were conducted in great haste by men who had not been trained as bank examiners. The Bank Commissioner, in his 1908 report, stated that a large number of banks which were not being operated in full accordance with the banking laws were allowed to continue in operation on their promise to correct objectionable features, but claimed that the banks admitted to guaranty were solvent. Twelve years later T. Bruce Robb studied the operation of the guaranty system and concluded:

... this description of the condition of the banks was far too roseate. It is now well known that a goodly number of banks, especially on the Indian Territory side, were positively insolvent.

Supervisory powers of the Bank Commissioner. The supervisory powers given the Bank Commissioner related chiefly to examinations, the capital position of the banks, and conditions under which a bank could be closed. The Commissioner also had some powers relating to the opening of new banks and to the quality of bank management.

The Commissioner was required to make two examinations a year of each bank, and empowered to make additional examinations at any time deemed necessary. He was required to call at least four times a year for reports of condition. Fees for examinations were specified in the law, ranging from \$15 to \$35 for each examination.

Under the 1908 law the Bank Commissioner prescribed the maximum amount of deposits which a bank could receive in proportion to its paid-up capital and surplus. In 1909 this power was replaced by a statutory prohibition on the receipt of deposits (excluding deposits of other banks) in excess of ten times paid-up capital and surplus. If the reports of a

^{1/} T. Bruce Robb, The Guaranty of Bank Deposits, p. 41.

bank indicated deposits in excess of this ratio, it became the duty of the Commissioner to require the bank to increase its capital or surplus or to cease to receive deposits. This provision of law could have been made an extremely valuable weapon in maintaining the banks in a sound condition and in preventing unwise bank expansion, had the ratio been computed on the capital and surplus as appraised by bank examiners instead of being computed on capital and surplus as stated in the reports of the banks, and had the examining force been sufficiently large and competent to provide good appraisals. 1

The Commissioner was also required to notify a bank to make good, within sixty days, any impairment of its capital stock. He could order the removal from office of any bank official whom he found to be dishonest, reckless or incompetent. He was required to report to the county attorney any violation of law constituting misdemeanor or a felony by an officer, owner, or employee of a bank.

No bank was permitted to open for business without authorization by the Bank Commissioner. The Bank Commissioner, from 1908 to 1910, declined to grant certificates of authorization to open if conditions in the various communities did not justify the organization of additional banks. However, exercise of this discretion was stopped by a decision of the State Supreme Court, and the Commissioner was required to issue such authorization if the bank had been organized in the manner prescribed by

^{1/} The law specified that action was to be taken on the basis of the reports submitted by the banks, such reports to be in the form required by the Commissioner. The law did not specify whether the Commissioner could require the banks, in submitting reports of assets and liabilities, to adjust valuations in accordance with examiners' appraisals.

law and its capital was fully paid. In 1913, however, the law was amended to require the approval of the Commissioner and of the State Banking Board before issuance of a charter for the organization of a bank. No specifications were given in the law for the guidance of the Board in exercising its discretion in passing on applications, but the Bank Commissioner, in his report for 1914, laid down the following principles:

Under the present system ... no charter is issued unless positive proof be furnished that the banking facilities of the community are not adequate to the public needs. There must be convincing evidence at hand that the enterprise will be an assured success. Those applying for a charter must be men in every way worthy of confidence and the proposed officers must be of the highest honesty and integrity, having ample banking experience.

The Bank Commissioner was given authority to close a bank if he was satisfied of its insolvency after examination, or if a bank were judged insolvent by a court. The law specified that a bank should be deemed insolvent when the actual cash market value of its assets was insufficient to pay its liabilities, or when it was unable to meet the demands of its creditors in the usual and customary manner, or when it failed to make good its reserve as required by law. The Bank Commissioner could also close a bank for violation of the banking law by any of its officers, or for interference with or refusal to permit examination of any of the affairs of the bank. The board of directors of a bank could place the bank in the hands of the Commissioner by posting a notice on the door.

If a bank which had been closed placed its affairs in legal and proper condition, the Commissioner could authorize its reopening; otherwise,

^{1/} Second Biennial Report of the Bank Commissioner, 1910, p. xii.

^{2/} Fourth Biennial Report of the Bank Commissioner, January 1, 1915, p. vii.

he took possession of the bank for liquidation. Sale of the bank's assets, and compounding of any bad or doubtful debts, were subject to approval of the District Court or judge thereof.

Statutory limitations on bank operations. The principal statutory limitations on banking operations, under the 1908 law and the amendments adopted while deposit guaranty was in force, are summarized below.

Responsibility of officers, directors and stockholders:

Losses resulting from loans made in violation of legal limitations

Liability of stockholders

Bonding of active officers and employees

Meetings of directors

Examinations by directors

Limitations on loans and investments:

Loans to officers and employees

Loans to directors and stockholders

Loans to stockholders' or officers' interests

Any person participating in any violation of the banking laws liable for damages sustained by stockholders, depositors, or creditors

Additionally liable for amount of stock owned, and no more

Board of Directors to require good and sufficient bond of the cashier and all officers having care of funds

At least two each year

Thorough examination twice a year of the books, records, funds and securities held by the bank, to be recorded in detail upon its record book and copy forwarded to Bank Commissioner and each stockholder

Loan to any active managing officer, directly or indirectly, prohibited

Total loans to stockholders not over 50 percent of paid-up capital

No provision except prohibition of indirect loans to active managing officers

Limitations on loans and investments (continued):

Maximum to single borrower

20 percent of paid-up capital stock

Maximum secured by real estate

20 percent of aggregate loans

Limitations on ownership of property:

Maximum value of banking house and fixtures

One-third of paid-up capital

Time limit on real estate acquired Five years by collection of debt

Ownership of other real estate

Prohibited

Ownership of corporate stock

Prohibited, unless acquired through collection of debt, except Federal Reserve bank stock after 1921

Limitations relating to deposits:

Maximum amount of deposits

Ten times capital and surplus, deducting deposits of other banks (proportion fixed by Bank Commissioner prior to 1909)

Maximum rate of interest on deposits

To be fixed by Bank Commissioner

Receipt of deposits when insolvent

Prohibited

Limitations on borrowings:

Maximum

50 percent of paid-up capital (no limitation after 1921 on borrowings from Federal Reserve bank by a member bank)

Power of Bank Commissioner

May require reduction if bank is borrowing habitually to re-loan

Maximum value of assets which may be pledged for borrowings

No provision

Limitations on payment of dividends:

Percentage of earnings to be carried to surplus prior to dividends

One-tenth of net profits until surplus reaches 50 percent of capital stock

When losses exceed or equal undivided profits

Prohibited

Limitations on payment of dividends (continued):

When reserve is impaired

Prohibited

When capital or surplus is impaired

Prohibited if any losses in excess of undivided profits have been charged to surplus and not restored

If bank is in danger of insolvency No provision

Required available funds, i.e., reserves:

Total amount of required reserve

Banks located in places under 2,500 population, 20 percent of deposits; in places over 2,500 population, 25 percent - reduced in 1915 to 15 and 20 percent, respectively. Federal Reserve member banks, after 1921, permitted to substitute requirements for such banks

Proportion of reserve required to be held in actual cash

One-third

of reserve

Permissible character of remainder Balances due from good solvent banks

Required fully-paid capital stock:2/

In places with	
500 inhabitants or less	\$10,000
500 to 1,500 inhabitants	15,000
1,500 to 6,000 "	25,000
6.000 to 20,000 "	50,000
More than 20,000 "	100,000

Required reports:

Resources and liabilities

At least four each year, oftener if called for by Bank Commissioner

Earnings and dividends

Annual statement of receipts and disbursements; each dividend declared and amount carried to surplus and undivided profits accounts

Average daily deposits during Deposits previous year

These reserve requirements applicable to banks and to trust companies engaged in banking, but not to savings associations not transacting a general banking business. Reserves of savings associations: actual cash equal to 10 percent of deposits; bonds of the United States or State of Oklahoma, or subdivisions thereof, worth not less than par, 10 percent of deposits.

After 1909. Requirements in 1908 ranged from \$10,000 to

\$25,000.

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NUMBER AND DEPOSITS OF GUARANTEED BANKS

Number of participating banks. The number of banks operating in Oklahoma which participated, and the number which were not eligible to participate, in the deposit guaranty system each year, are given in Table 1. The participating banks include all State banks and, during the years 1908-1911, trust companies. The non-participating banks include national banks and, after September 1911, trust companies operating under State law.

During the first two years of deposit guaranty the proportion of banks in the State operating under the guaranty system rose rapidly, due primarily to the conversion of national banks to State banks. After the third year the proportion operating under the guaranty system declined, primarily as the result of conversions of State to national banks.

Deposits of participating and non-participating banks. The deposits of the participating banks and non-participating banks, for each year, are given in Table 2. During the first two years of deposit guaranty the proportion of all bank deposits in the State which was held by the participating banks rose rapidly. After 1911, however, the proportion held by banks in the guaranty system declined.

The deposits of participating banks given in Table 2 should not be considered identical with the deposits specifically covered by guaranty. Public funds otherwise guaranteed, and certified and cashier's checks, items which were excluded from guaranty, are included in the figures given here.

Concentration of bank deposits. Table 3 shows the amounts of deposits held on November 10, 1910, and December 29, 1920, by State banks

Table 1. NUMBER OF OPERATING BANKS IN OKLAHOMA PARTICIPATING AND NOT PARTICIPATING IN THE DEPOSIT GUARANTY SYSTEM, 1908-1923, BY YEARS

Call date	All banks	Participating in deposit guaranty2	Not participat-	Percentage of
nearest	operating		ing in deposit	total number
January 1	in Oklahoma		guaranty2	participating
1908 1909 1910 1911 1912 1913 1914 1915 1916 1917 1918 1919 1920 1921 1922 1923	777 834 887 924 914 923 913 913 903 885 901 936 944 977 938 910	468 546 668 695 631 615 582 563 557 547 566 581 599 622 556 463	309 288 219 229 283 308 331 350 346 338 335 355 345 355 345 355 347	60 65 75 75 69 67 64 62 62 63 64 59 51

^{1/} Call dates for State and national banks are not identical in several years.

^{2/} Includes all banks and trust companies operating under State law, except 2 trust companies in 1912, 2 in 1913, and 1 in 1914. After 1911 trust companies were excluded from deposit guaranty, but none is reported in operation after 1914. Figures for 1908-1921 from annual reports of the Bank Commissioner; figures for 1922 and 1923 from Federal Reserve Bulletin, November 1937, p. 1117. No reports of the Bank Commissioner have been published since 1920.

^{3/} Includes national banks operating in Oklahoma, and also 2 trust companies in 1912, 2 in 1913, and 1 in 1914, operating under State law but excluded from deposit guaranty.

Table 2. DEPOSITS OF OPERATING BANKS IN OKLAHOMA PARTICIPATING AND NOT PARTICIPATING IN THE DEPOSIT GUARANTY SYSTEM, 1908-1923, BY YEARS

(In thousands of dollars)

Call date nearest January 11/	All banks operating in Oklahoma	Banks participating in deposit guaranty2/	Banks not participating in deposit guaranty3/	Percentage of deposits in all banks held by participating banks
1908 1909 1910 1911 1912 1913 1914 1915 1916 1917 1918 1919 1920 1921 1922 1923	61,797 75,238 105,815 121,012 106,698 122,802 135,233 129,301 158,153 265,349 381,935 338,998 513,071 434,364 359,691 392,990	18,182 31,617 54,769 61,309 44,004 45,878 46,131 44,773 48,460 84,799 137,392 120,660 190,900 160,673 112,579 75,027	43,615 43,621 51,046 59,703 62,694 76,924 89,102 84,528 109,693 180,550 244,543 218,338 322,171 273,691 247,112 317,963	29 42 52 51 41 37 34 35 31 32 36 36 37 37 31

^{1/} Call dates for State and national banks are not identical in several years.

The amounts of deposits given here exceed the amounts of deposits specifically protected by the depositors' guaranty fund, since public funds otherwise secured, certified and cashier's checks, and other items which were excluded from guaranty, are included in total deposits.

3/ Deposits of national banks plus the deposits of trust companies given in footnote 2.

^{2/} Deposits of all State banks and trust companies, with deposits of trust companies deducted. Deposits of trust companies are as follows: 1912, \$600,000 (est.); 1913, \$701,000; 1914, \$500,000 (est.). Figures for 1908-1921 from annual reports of the Bank Commissioner; figures for 1922 and 1923 estimated by averaging the deposits for the preceding and succeeding June 30, as given in the annual reports of the Comptroller of the Currency. No reports of the Bank Commissioner have been published since 1920.

Table 3. NUMBER AND DEPOSITS OF STATE BANKS IN OKLAHOMA, NOVEMBER 10, 1910, AND DECEMBER 29, 1920

Banks grouped by amount of deposits

	Number of banks	Amount of deposits (thousands of dollars)	Percentage of number of banks	Percentage of aggregate deposits
All State banks, November 10,	693	61,612	100.0	100.0
Banks with deposits of - \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	520 133 34	26,590 19,150 11,178	75.0 19.2 4.9	43.2 31.1 18.1
\$500,000 to \$1,000,000 \$1,000,000 to \$2,000,000	5	3,362 1,332	0.7	5.5 2.2
Largest banks Largest 10 banks		1,332 4,157 6,513		2.2 6.7 10.6
All State banks, December 29,	621	158,960	100.0	100.0
Banks with deposits of - \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	174 268 119	12,053 43,671 40,437	28.0 43.2 19.2	7.6 27.5 25.4
\$500,000 to \$1,000,000 \$1,000,000 to \$2,000,000 \$2,000,000 to \$5,000,000	41 14 5	27,512 19,833 15,454	6.6	17.3 12.5) 9.7) ^{22.}
Largest bank Largest 5 banks Largest 10 banks		4,222 15,454 24,507		2.7 9.7 15.4

^{1/} Tabulated from statements relating to individual banks, as given in the reports of the Bank Commissioner. Totals differ slightly from the figures given in summary tables for the same dates in the Commissioner's reports, the latter figures being as follows: November 19, 1910, 694 banks with deposits of \$61,442,000; December 29, 1920, 622 banks with deposits of \$160,673,000.

in Oklahoma grouped according to their deposits. In 1910, 11 percent of the deposits, and in 1920, 15 percent, were concentrated in the ten largest banks. The largest bank in 1910 held 2.2 percent, while the largest bank in 1920 held 2.7 percent, of the deposits of all State banks.

The figures for 1910 do not show as great a concentration of the risk falling upon the guaranty fund as actually existed during the early years of the guaranty system. The largest bank in the State, with deposits of \$2,742,000, had failed in September 1909. At the time of its failure, this bank held approximately 5 percent of the deposits of all banks covered by the guaranty system.

BANK FAILURES

Number and deposits of failed banks. During the 15 years of the guaranty system in Oklahoma, 130 participating banks closed because of financial difficulties. The aggregate deposits of these banks at time of suspension amounted to approximately \$29,407,000. Twelve of the banks which closed were banks which had previously suspended and had reopened or reorganized.

Nearly one-half of the closed banks were very small, having less than \$100,000 deposits each. These banks held about one-tenth of the deposits of all of the suspended banks. Only four of the closed banks had deposits of more than \$1,000,000, but these four banks accounted for over one-fourth of the deposits of all of the closed banks. A distribution of the closed banks and of their deposits according to the amount of deposits held is given in Table 4.

^{1/} Similar figures by two-year intervals during this decade are shown in Table 11, p. 53.

Table 4. NUMBER AND DEPOSITS OF STATE BANKS IN OKLAHOMA CLOSED BECAUSE OF FINANCIAL DIFFICULTIES, FEBRUARY 14, 1908, TO MARCH 31, 1923

Banks grouped by amount of deposits at time of	lanks grouped b	amount	of	deposits	at	time	of	closing
--	-----------------	--------	----	----------	----	------	----	---------

	Number of	Deposits (in thousands	the state of the latest st	ge of total
	banks	of dollars)	Number	Deposits
Total	130	29,407	100.0	100.0
Banks with deposits of \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	60 40 20	3,173 6,266 7,238	46.1 30.8 15.4	10.8 21.3 24.6
\$500,000 to \$1,000,000 \$1,000,000 to \$3,000,000	6 4	4,707 8,023	4.6	16.0 27.3

Failures occurred each year that the guaranty fund was in operation. The average annual rate of failure, computed as the number of banks which failed per 100 in operation at the beginning of the year, was 1.4. The deposits of the suspended banks averaged \$2.22 per year for each \$100 of deposits in operating banks.

The heaviest failure rates, with respect to the number of banks, were in 1921, 1922, and early 1923. A substantial part of these failures occurred after the fund was exhausted in the autumn of 1921 and the officials had ceased to pay off the depositors of closed banks. In terms of deposits, failures in 1921, which exhausted the fund, were relatively less serious than those in 1909 and in 1913. In fact, the fund was as insolvent in 1909, after the failure of the largest bank in the State, with deposits of \$2,742,000, as it was when payments to depositors ceased in 1921. However, in 1909, the Banking Board was able to delay or adjust

payments to some of the large depositors who were closely associated with the management of the bank and thus to tide the fund over the crisis.

Further, the 1909 crisis was succeeded by a period with failure rates sufficiently low and assessment rates sufficiently high to permit the fund to be recouped, while the failures in 1921 and 1922 resulted in obligations so great that, with the reduced maximum rate of assessment, many years would be required to meet them.

The number of failures each year, together with the deposits of the closed banks, and ratios to the number and deposits of operating banks at the beginning of the year, are given in Table 5.

Suspensions by size of bank. In Table 6 the size distribution of closed State banks is compared with an average of the size distributions of operating banks for dates for which such data are available.

During the period of the guaranty fund, that is, from February 14, 1908, to March 31, 1923, failures among State banks were positively correlated with size of bank. The smallest banks had the lowest, and the largest banks the highest, failure rate. Failures among banks with less than \$100,000 of deposits, for the entire 15-year period, were about one-sixth of the average number of operating banks of this size, while failures among banks with more than \$1,000,000 deposits were four-fifths of the average number of such banks in operation. If failure rates are computed for the period up to October 31, 1921, when payments to depositors in closed banks ceased, the same relationship holds - the failure rate for banks of more than \$1,000,000 deposits being four times as high as that for banks with deposits under \$100,000.

This relationship of failures to size of bank was also characteristic of national banks in Oklahoma during the same period. The failure rate of national banks with more than \$1,000,000 deposits was five times as high as that for banks with deposits under \$100,000.

Table 5. NUMBER AND DEPOSITS OF STATE BANKS IN OKLAHOMA CLOSED BECAUSE OF FINANCIAL DIFFICULTIES, FEBRUARY 14, 1908, TO MARCH 31, 1923, BY YEARS

		sed banks	Number	Deposits in closed	
Year	Number	Deposits (in thousands of dollars)	suspended per 100 active banks	banks per \$100 of deposits in active banks	
•					
1908 (after February 14) 1909 1910 1911	1 3 3 8 4	37 2,873 591 1,040 611	.2 .5 .4 1.2 .6	\$0.20 9.09 1.08 1.70 1.39	
1913 1914 1915 1916 1917	16 5 5 1 2	2,002 431 311 40 85	2.6	4.36 .93 .69 .08	
1918 1919 1920 1921 1922	3 5 8 25 <u>1</u> / 31	1,199 902 3,567 5,979 <u>1</u> / 8,219	•5 •9 1.3 4.0 5.6	.87 .75 1.87 3.72 7.30	
1923 (to March 31)	10	1,520	8.62/	8.102/	
Sub-totals for selected periods:					
1908-1919 Jan.1920-Oct.1921 Nov.1921-March 1923	56 19 55	10,122 5,927 13,358	1.72/ 6.82/	1.37 ² / 1.82 ² / 8.31 ² /	
Total	130	29,407.	1.52/	2.412/	

¹⁾ Of these banks, ll with deposits of \$2,360,000, closed prior to the time payments to depositors ceased because of insolvency of the fund.

^{2/} Annual rate.

Table 6. SIZE DISTRIBUTION OF FAILED BANKS IN OKLAHOMA COMPARED WITH AVERAGE SIZE DISTRIBUTION OF OPERATING STATE BANKS:
PERIOD OF OPERATION OF DEPOSIT GUARANTY SYSTEM

	Average	Number of	Percentage of total number			
	number of operating banks!	failed banks2/	Operat- ing banks	Failed banks	Failed banks per 100 active banks	
Total	592	130	100.0	100.0	22	
Banks with deposits o \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	359 166 48	60 40 20	60.7 27.9 8.1	46.1 30.8 15.4	17 24 42	
\$500,000 to \$1,000,000 \$1,000,000 to \$3,000,00	0 5	6	2.4	4.6	43 80	
depo ope b (tho	rerage sits of rating anks usands collars)	Deposits of failed bank (thousands of dollars)	s total Operat-	tage of deposits Failed banks		
Total	78,157	29,407	100.0	100.0	\$38	
10001	1-1-21	-23,101	100.0	100.0	470	
Banks with deposits o		3,173 6,266 7,238	23.1 32.2 20.4	10.8 21.3 24.6	18 25 45	
Banks with deposits o \$100,000 or less \$100,000 to \$250,000	<u>f -</u> 18,056 25,174	3,173 6,266	23.1	10.8	18 25	

L/ Averages of number operating on dates for which data regarding individual banks are available in the reports of the Bank Commissioner, as follows: September 23, 1908; November 10, 1910; November 26, 1912; December 8, 1914; November 17, 1916; November 17, 1918; and December 29, 1920.

^{2/} Banks closed because of financial difficulties during period of operation of guaranty fund, February 14, 1908, to March 31, 1923.

Comparison with suspensions in other States. The number of bank failures during the years, 1908-1922, relative to active banks, was nearly twice as large in Oklahoma as in the United States as a whole, or as in the six States contiguous to Oklahoma combined. However, in one of the contiguous States (New Mexico), the relative number of State bank suspensions was higher, and in two other contiguous States (Colorado and Arkansas), the rate was nearly as high as in Oklahoma. In terms of deposits the Oklahoma rate for State banks was apparently higher than in any of the contiguous States, though not far above that in New Mexico. 1/A comparison of the Oklahoma rates with those for contiguous States and the United States is given in Table 7.

In two of the contiguous States, Kansas and Texas, deposit guaranty systems were operative during most of the period embraced by these figures. The failure rates for both of these States were far below those for Oklahoma.

These figures suggest that the existence of deposit guaranty in Oklahoma was not a significant causative factor in the high rate of bank suspensions, as has been claimed by opponents of the principle of deposit insurance. The high rate of failures in the State appears more probably due to causes which operated also in New Mexico and Colorado, and to a lesser extent in Arkansas and Texas, but were of much less consequence in Kansas and Missouri.

Causes of bank failures. Numerous circumstances contribute to the financial difficulties which result in bank failures. However, in

I/ Information regarding failures of State banks in New Mexico is not available for four years of the period, so that the rate for that State may have been higher than the rate for Oklahoma.

Table 7. BANK FAILURE RATES IN OKLAHOMA, 1908-1922, COMPARED WITH RATES IN CONTIGUOUS STATES AND IN THE UNITED STATES!

	Failures per 100 operating banks			Deposits in failed banks per \$100 in operating banks			
	State and national banks	State	National banks	State and national banks		National banks	
Oklahoma	14.6	20.4	4.0	\$15.36	\$34.80	\$4.26	
Six contiguous State	s 7.3	8.4	3.5	3.81	6.73	1.42	
Kansas Missouri Arkansas Texas New Mexico Colorado	4.6 3.4 15.7 8.2 30.9 13.9	5.4 3.7 17.0 11.4 45.3 19.7	2.6 8.3 3.8 12.2 5.0	3.88 1.33 9.19 6.48 11.92 3.30	6.19 2.49 10.96 17.56 27.78 6.41	6.14 2.23 4.24 2.07	
Entire United States	8.7	9.0	2.9	2.72	4.11	1.04	

^{1/} Tabulated from data from the following sources: reports of bank commissioners in the various States; Willis, Banking Inquiry of 1925; annual reports of the Comptroller of the Currency; Federal Reserve Bulletin, September 1937.

most cases the factors responsible for failure are predominantly associated with one of the following groups: (a) dishonesty on the part of officers or employees; (b) excessive loans directly or indirectly to certain business interests, often to the interests of an influential official or stockholder; (c) adverse economic conditions in a dominant industry and collapse of property values associated therewith; and (d) general managerial incompetence.

For 35 failures which occurred during the years 1909 to 1918, the Biennial Reports of the Bank Commissioner of Oklahoma contain brief comments regarding the cause of failure, the character of the bank's management, or other aspects of the bank's operations. In about one-half of these cases sufficient information is given to indicate the major factor responsible for the failure. In twelve cases defalcation by officers or employees is mentioned, and was assigned primary responsibility for the failure in the majority of these cases. In four cases excessive loans to certain interests were noted, and in four cases failure was ascribed to bad or incompetent management. In only two cases was any mention made of business depression or of adverse economic circumstances.

The operation of the deposit guaranty law in Oklahoma during the first 12 years of its history, from 1908 to early 1920, has been carefully studied by Mr. T. Bruce Robb. During that period, 56 failures in the State occurred of which a number are selected as typical. Of the 18 cases for which Mr. Robb cites specific causes of failure, or for which he gives sufficient information to warrant classification, six were attributed

^{1/} Robb, The Guaranty of Bank Deposits, pp. 42-73. In this book Mr. Robb states that 57 failures had occurred, but only 56 are mentioned in the reports of the Bank Commissioner for the period.

chiefly to fraud or defalcation on the part of bank officers, and 12 to speculative and excessive loans to interests associated with the bank managements.

The Comptroller of the Currency, in his report for 1921, summarized the experience of States with deposit guaranty plans in operation.

His statement regarding the causes of bank failures in Oklahoma is as follows:

The closing of 42 of the 95 banks was due to a decline in the value of the assets, poor management, and slow loans, inability to realize on loans, injudicious investments, and shrinkage in deposits. In 34 cases closing was due to criminal acts on the part of officers, including embezzlement, misapplications, or use of the banks' funds in speculation for private gain. In 19 cases the cause of closing is not on record here.

The failures described in the Bank Commissioner's reports, and those reviewed by Mr. Robb, took place prior to the collapse in prices of farm products and the business depression in 1921. The failures in 1921 and in 1922 were more directly associated with adverse economic circumstances than were those in the preceding years, though such evidence as is available indicates that incompetent management and speculative loans also played a part in these failures. There is no evidence that the number of failures during this period was affected by the insolvency of the guaranty fund. High failure rates in 1921 and 1922, in comparison with those during the previous decade, occurred not only among the State banks in Oklahoma, but also among national banks in the State, and among both State and national banks in most of the contiguous States.

p. 188.

Annual Report of the Comptroller of the Currency, 1921,

FINANCIAL HISTORY OF THE GUARANTY FUND

Sources and adequacy of information. Information regarding the operation of the Oklahoma Depositors' Guaranty Fund is decidedly inadequate. No statements of the fund were published in the reports of the Bank Commissioner, except for the last three months of each of the years 1914, 1916, and 1918. A partial statement for the entire period appears in a report made to the Oklahoma House of Representatives in February 1923. Some additional information is available in surveys of deposit guaranty plans made by students and agencies outside the State, and in the decision of the Oklahoma Supreme Court regarding final disposition of the fund and newspaper comments thereon.

For the period, 1908-1919, the receipts from assessments were sufficient to cover losses and expenses by a small margin, though the fund incurred a heavy indebtedness during the first half of this period.

Information regarding the cost to the guaranty fund of most of the bank failures during this period is given in the Biennial Reports of the Bank Commissioner, except for those occurring during the years 1916 and 1919.

Additional information regarding some of these failures, and also some information regarding the receipts of the fund and its status early in 1920, are given by Robb in his book published in 1921.

During the period from January 1, 1920, to October 31, 1921, depositors in failed banks were paid by the Depositors' Guaranty Fund for

^{1/} House Journal, February 21, 1923, pp. 773-75.

^{2/} These include Robb, The Guaranty of Bank Deposits (Houghton Mifflin Company, 1921); Thornton Cooke, articles in the Quarterly Journal of Economics, November 1913 and November 1923; Federal Reserve Board, in Federal Reserve Bulletin, September 1925; Blocker, The Guaranty of Bank Deposits (The School of Business, University of Kansas, 1929).

the most part with money borrowed through the sale of Depositors' Guaranty Fund Warrants for cash. For this period no information is given in reports of the Bank Commissioner regarding bank failures, or the operations of the guaranty fund, except the names of banks taken over by the Commissioner during the year 1920. Some information regarding the amount of warrants issued is given by Thornton Cooke in an article in the Quarterly Journal of Economics, November 1923; and the amounts paid out by the guaranty fund for banks which failed between January 1 and October 31, 1921, are given in schedules submitted in 1931 to the Federal Reserve Committee on Branch, Group, and Chain Banking. 1

For the period from November 1, 1921, after which warrants were no longer issued and the fund became inoperative, to March 31, 1923, the only information available is that given in the schedules submitted to the Federal Reserve Committee on Branch, Group, and Chain Banking.

Income and expenses of the guaranty fund. An estimate of the income and expenses of the Oklahoma Depositors' Guaranty Fund during its entire existence is given in Table 8. The figures take into account receipts and disbursements subsequent to repeal of the law, including the final disposition of the fund in 1934. The estimates in this table exclude borrowings of the fund which were eventually repaid, and also payments to depositors in failed banks which were made directly from the cash and quickly liquidated assets of those banks.

The information available indicates that the total receipts of the guaranty fund throughout the entire period of its operation, excluding

¹ The schedules were prepared from the records in the Bank Commissioner's office.

Table 8. ESTIMATED TOTAL INCOME AND EXPENSES OF THE OKLAHOMA DEPOSITORS' GUARANTY FUND

	Amount (thousands of dollars)
Income and net unpaid borrowings	
Assessments collected Liquidation of assets of failed banks 2	3,730 2,330
Final default (net amount of warrants issued and not redeemed) 2	1,070
Total income	7,130
Expenses	
Payments to depositors in suspended banks 4 Interest on indebtedness Administrative expenses	6,555 225 350
Total expenses	7,130

NOTE: This is not an accurate statement of the income and expenses of the Oklahoma depositors' guaranty fund. It is an estimate prepared from available data, and shows only the approximate magnitudes of the various items.

1/ Federal Reserve Bulletin, September 1925, p. 631.

2/ To 1923, amounting to \$2,195,000, Federal Reserve Bulletin, op. cit., plus an allowance of \$135,000 for subsequent recoveries (estimated from difference between cash on hand as given in Federal Reserve Bulletin, op. cit., and cash on hand at time of final disposition of the fund in 1934).

3/ Estimated from warrants unpaid at time of final disposition of fund (\$1,200,000) and estimated amount of final cash payment to holders of those warrants (\$130,000), as reported in The American Banker, October 23, 1934.

Estimate derived indirectly from the remaining figures. The Federal Reserve Bulletin, op. cit., states that about \$6,000,000 was paid to depositors by the guaranty fund.

Table 8. ESTIMATED TOTAL INCOME AND EXPENSES OF THE OKLAHOMA DEPOSITORS' GUARANTY FUND (continued)

- 5/ Based on rate of 6 percent and amount of warrants outstanding at the end of the years 1914, 1916, and 1918, as given in the Biennial Reports of the Bank Commissioner, and amounts outstanding at the end of other years, prior to 1921, estimated from assessments levied and deposits paid by the guaranty fund. No interest was paid on warrants issued in 1921, according to the Federal Reserve Bulletin, September 1925, p. 631.
- 6/ Warrants issued up to January 31, 1923, for salaries, expense of examiners, office supplies, bank robbers and miscellaneous, amounted to \$252,261, House Journal, February 21, 1923. The remainder is an allowance for expenses subsequent to January 31, 1923, based largely on the difference between the reported cash on hand, and of final payment to warrant holders, at time of final disposition of the fund in 1934 (The American Banker, October 23, 1934).

all borrowings, amounted, approximately, to \$6 million. Three-fifths of these receipts were from assessments, and the remainder from the liquidation of assets of failed banks (excluding, as noted above, assets immediately liquidated). The fund paid out about \$6.6 million to depositors, in addition to amounts made available to depositors directly from assets of failed banks, and spent approximately \$0.6 million in administrative expenses and interest. Of the amount paid to depositors, about \$1.0 million was obtained from that portion of the warrants sold which was defaulted and never paid by the guaranty fund.

Annual assessments and losses in failed banks. The annual rates of assessment, amounts of assessment levied, and estimates of losses from bank failures, are given in Table 9.

The annual rates of assessment ranged from one-fifth of 1 percent of deposits, in 1916 and subsequent years, to one and one-fifth percent in 1911. The amounts of assessments levied or due ranged from \$90,000 in 1916 to \$601,000 in 1911.

The total loss to the guaranty fund incurred in banks whose depositors were depositors were paid by the fund (including banks whose depositors were paid from proceeds of warrants which were defaulted)—that is, the loss in all banks closed before payments to depositors ceased in the autumn of 1921—amounted approximately to \$4.2 million. This compares with assessments which had been levied amounting approximately to \$3.8 million.

Losses suffered by depositors in banks which failed during the 17 months which elapsed between the time payments to depositors ceased and the date of repeal of the law amounted to more than \$6 million, or

Table 9. RATES AND AMOUNTS OF ASSESSMENT, AND ESTIMATED LOSSES FROM BANK FAILURES, OKLAHOMA DEPOSITORS' GUARANTY FUND, BY YEARS

(Amounts of assessments, losses, and deposits in thousands of dollars)

Year asse (per	te of ssment cent of osits)	Amount of assessment levied or due2	Losses in Paid by guaranty fund	Borne by depositors4	Deposits in failed banks5/
1909 1910	1.00 •95 •20 1.20 •95 •40 •40 •40 •20 •20 •20 •20	199 327 287 601 511 202 148 162 90 133 209 232	644 232 604 115 661 203 75 11	:: :: :: :: :: :: :: ::	37 2,873 591 1,040 611 2,002 431 311 40 85 1,199 902
allotted by year 1920 1921 (JanOct.) 1921 (NovDec.) 1922 (to March 31)	.20	302 362 362 278 184	839 1,605 1,279	1,561 4,231 456	3,567 2,360 3,619 8,219 1,520
Total		4,227	6,555	6,248	29,407
Adjustments: For uncollected assessments For recoveries from assets		- 497			
acquired from failed banks			- 2,330		
Net total		3.730	4,225	6,248	29,407

l/ Includes regular and special assessments, but excludes bonds or cash deposited as security for payment of assessments. These rates were applied to average daily deposits during the preceding year, except in the case of the initial assessment, which was applied to deposits as of December 11, 1907. Rates for 1908-1920 from Robb, The Guaranty of Bank Deposits, page 73. Rates for 1921-1923, according to provisions of law, since information is not available regarding assessments actually levied.

Table 9. RATES AND AMOUNTS OF ASSESSMENT, AND ESTIMATED LOSSES FROM BANK FAILURES, OKLAHOMA DEPOSITORS' GUARANTY FUND, BY YEARS (cont.)

2/ Includes regular and special assessments levied or due in accordance with the rates in the preceding column, and also additional collections resulting from increases in deposits in certain banks and from new banks opening. Figures for 1908-1920 from Robb, op. cit.; for 1921-1923, estimated from average deposits for available dates during preceding year. Total assessments collected from Federal Reserve Bulletin, September 1925, page 631. The adjustment for uncollected assessments is the difference between the total amount levied or due and the total amount collected.

3/ Figures for 1909-1915, and 1917-1918 are taken from information regarding individual banks given in Robb, op. cit., or in the biennial reports of the Bank Commissioner. These figures represent the net cost to the Guaranty Fund after most of the assets acquired from each bank had been liquidated. Figures for 1916 and 1919 estimated at the same average percentage of deposits (28 percent) as those for 1909-1915 and 1917-1918. The figure for 1908-1919, unallocated by years, is derived indirectly and represents portions of the deposits paid by the guaranty fund which were recovered from liquidation of the assets of the failed banks prior to the dates for which the net cost to the guaranty fund is given in the Bank Commissioner's reports. Figures for 1921 (to October 31) are taken from schedules for each suspended bank submitted to the Federal Reserve Committee on Branch, Group, and Chain Banking, supplemented by information regarding one bank given in Cooke's article in the Quarterly Journal of Economics, November 1923, p. 112. Figures for 1920 estimated at 45 percent of deposits, slightly lower than the figure (50 percent) for 1921. Substantially the same total for the period from January 1, 1920, to October 31, 1921, may be obtained by adding to the figure for warrants issued in thirteen banks as given by Mr. Cooke (\$2,196,000), one-half of the deposits of five banks which failed in 1920, for which no unpaid warrants appear to have been outstanding in October 1921.

For total see footnote 4, Table 8, and for recoveries from assets acquired from failed banks see footnote 2, Table 8.

Estimated from payments on claims in the case of banks fully liquidated, and payments to 1931 in the case of those still in process of liquidation at that time, as reported on schedules submitted to the Federal Reserve Committee on Branch, Group, and Chain Banking.

5/ See Table 5.

substantially more than the losses to the fund during the preceding 12 years.

Adequacy of the guaranty fund. The extent to which the Oklahoma Depositors' Guaranty Fund met the claims of depositors in failed banks is shown in Table 10. For the entire period during which the law was on the statute books, about 64 percent of the deposits of failed banks were eventually paid from the proceeds of liquidation of the assets of those banks. Guaranty fund assessments provided payments equivalent to 11 percent of the deposits, while the remaining 25 percent were lost to the depositors or to holders of guaranty fund warrants. The assessments collected during the entire period thus amounted to less than one-third of the amount which would have been necessary to have met all losses in failed banks up to the time the law was repealed.

The estimate of eventual losses from bank failures during the period in which the guaranty law was on the statute books in Oklahoma, given in Table 9, indicates that aggregate assessments of approximately \$11,000,000 would have been sufficient to have met those losses and the administrative expenses of the fund. An average annual assessment during the fifteen years of nine-tenths of 1 percent would have provided this sum. The average actually collected amounted to three-tenths of 1 percent, or approximately one-third of the required amount.

Reference to Table 9 shows that the rate of assessment during the first eight years of the period, except for one year in which only the regular assessment of one-fifth of 1 percent was levied, ranged from four-tenths of 1 percent to one and one-fifth percent. The assessments collected during those eight years amounted to seven-tenths of 1 percent

Table 10. DEPOSITS IN FAILED BANKS IN OKLAHOMA DURING THE PERIOD OF OPERATION OF THE DEPOSIT GUARANTY LAW, PAID AND UNPAID, WITH SOURCES OF FUNDS USED IN PAYMENT

(In millions of dollars)

	Total	75 banks closed Feb. 1908- Oct. 19211/	55 banks closed Nov. 1921- Mar. 19232/
Total deposits	29.4	16.0	13.4
Deposits paid from:			
Liquidation of assets directly and indirectly	18.9	11.8	7.1
Depositors' Guaranty Fund assessments4/	3.1	3.1	
Borrowings never repaid (i.e., warrants not redeemed)	1.1	1.1	
Losses to depositors5/	6.3		6.3
Percentage of total deposits	100	100	100
Realized from liquidation of assets	64	74	53
Met by Depositors' Guaranty Fund assessments	11	19	
Losses to warrant holders Losses to depositors	21		47

Banks the depositors of which were paid by the Depositors' Guaranty Fund from the proceeds of assessments and of warrants sold.

^{2/} Banks closed after issuance of warrants and payments to depositors ceased, but prior to repeal of the deposit guaranty law.

^{3/} Of the total for the period February 1908 - October 1921, it is estimated that approximately \$9.5 million was paid directly to depositors from the proceeds of the assets of the banks (i.e., from cash and quickly liquidated assets), and approximately \$2.3 million indirectly through collections from assets taken over by the guaranty fund. The entire amount for the 55 banks suspended in 1921-1923 was paid directly from the proceeds of liquidation of the assets of the failed banks, such proceeds for each bank being used to pay its own depositors.

^{4/} Assessments collected minus administrative expenses and interest paid on indebtedness. See Table 8.

^{5/} See Table , and footnote 4 to that table.

per year of total deposits. The assessments collected during the first five years of the fund amounted to nine-tenths of 1 percent of total deposits per year.

Had the guaranty law remained in its original form or as amended in 1909, but without the amendments with respect to assessments which were enacted in 1913, the State Banking Board would have been authorized to levy assessments sufficient to have met all of the losses arising from closed banks up to the date of repeal. Further, the average rate of assessment during the 15-year period would not have been higher than the average rate during the first five years of the fund.

This does not mean that with an average rate of assessment of nine-tenths of 1 percent, the fund would have been enabled to pay depositors promptly without borrowing, since borrowing would have been necessary to advance to the depositors in some years the amounts which were later collected from liquidation of the assets of the failed banks.

The period from February 1908, to March 31, 1923, during which the law was on the statute books, included several years in which bank failures were infrequent and losses light. On the other hand, it covered three periods in which serious and extensive waves of failure occurred: 1909, with the failure of the largest bank in the State; 1913, when several good-sized banks closed; and 1921 and 1922, in which failures were widespread among all sizes of banks.

I/ This statement does not take into account the possibility that continuation of the rates of assessment prevalent during the early years of the fund would have resulted in the conversion of a large number of State banks into national banks.

The abnormally high failure record of large banks was an important influence in the rate of assessment which would have been necessary to have met the burden falling upon the guaranty fund. Approximately one-fourth of the total loss on account of failed banks during the 15-year period was incurred in the four banks with deposits of more than \$1,000,000 at time of failure; and one-fifth of the total loss in six other banks with deposits of more than \$500,000.

The failures of large banks were also responsible for the periods of crisis in the operation of the guaranty fund. The Columbia Bank and Trust Company, of Oklahoma City, which failed in September 1909, when the guaranty law had been in operation less than two years, was the largest bank in the State. This failure nearly wrecked the guaranty system. The guaranty fund at that time amounted only to \$300,000, of which one-sixth was on deposit in the failed bank, while the deposit liabilities of the bank amounted to nearly \$3 million. The fund was kept in existence only by the determination of the officials to demonstrate the success of the law, and the adoption of emergency methods of handling the situation. Holders of accounts with small balances were paid off in full with the aid of additional funds obtained from the owners of the failed bank. Nearly one-half of the deposits of the failed bank were those of country banks throughout the State, and these banks were permitted to select assets from the portfolio of the defunct bank to offset their claims. The remaining claimants were finally paid from the assessments in future years. Also, it was primarily the failure of the Bank of Commerce, Okmulgee, with deposits of nearly \$2 million, on November 1,

igitized for FRASER tps://fraser.stlouisfed.org 1921, which increased the outstanding obligations of the guaranty fund so much that guaranty fund warrants could no longer be sold and the fund became inoperative.

The burden of assessments. To bankers in Oklahoma the assessments levied during the first few years of the Depositors' Guaranty Fund appeared to be heavier than could be borne by the banks. They pointed to the fact that the assessments amounted to what they deemed an extremely high percentage of their capital and surplus, averaging during the first six years of the fund approximately 3 percent per year of the total capital and surplus of the banks, and thus presumably absorbing a very large proportion of the profits available for dividends to stockholders.

Whether the assessments did in fact absorb a large proportion of profits which would otherwise have been available for dividends is unknown. No figures of profits or dividends of State banks in Oklahoma during the period are available. Nor is information available regarding the extent to which the limitation on the rate of interest paid on deposits, imposed by the deposit guaranty law, reduced the expenses of operation of the banks.

The problem of making adequate profits is not so much a problem of the magnitude of expenditures which have to be borne by all banks as a part of their cost of business, as it is of the margin between the charges which they can make for their services and the aggregate expenses which they must incur. Since the rate of interest currently charged on loans by the banks in Oklahoma was very high, judged by average rates in eastern money centers or by average rates for the United States as a whole,

and the rate of interest paid by the banks on deposits was also comparatively high, and since the latter rates are determined by competition among the banks themselves, it should have been possible for the banks participating in deposit guaranty to have maintained their profit position by reducing the rate of interest paid to depositors.

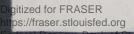
However, the presence of another group of banks in the State, operating under national rather than under State law, provided a competitive situation which made it difficult for State banks as a group to make these adjustments. For two years prior to 1913, when the law was amended in such a way that adequate assessments could no longer be levied, there had been a substantial tendency for State banks to convert to national banks. The proportion of the total number of banks operating under State law and therefore participating in the deposit guaranty system had declined from 75 percent to 67 percent, and the proportion of aggregate deposits in the participating banks from 51 percent to 37 percent of all banks in the State.

There is good reason to believe that the guaranty system could have been successful had it embraced all banks operating in the State.

Further, if all banks in the State had been covered, without affecting the quality of bank supervision or other factors determining the number of failures, the necessary assessment rate for the entire 15-year period would have averaged less than four-tenths of 1 percent per year.

EFFECTIVENESS OF BANK SUPERVISION

The high rate of assessment which would have been necessary to have prevented insolvency of the Oklahoma depositors' guaranty fund, in



comparison with the rate necessary to have operated a similar fund on a national scale during the same period of time, is a direct reflection of the relatively high frequency rate of bank failures in the State. This abnormally high failure rate, as has been noted above, was due in substantial part to deliberate bank mismanagement - sheer dishonesty, participation in unduly speculative enterprises, and overextension of loans to enterprises with which bank officials or favored customers were connected. It is proper to ask whether the failure rate could have been markedly reduced by a reasonably effective supervision over banking operations by a department of the State government.

The powers of the Bank Commissioner, which have been outlined above, appear sufficient, had they been adequately used, to have checked many of the malpractices of Oklahoma banks. The two examinations required to be made each year, if thoroughly conducted, would have disclosed, long before failure, the conditions described in Robb's account of the affairs of the chief banks which failed. Use of the legal power of the Commissioner to close banks for violation of the banking law by its officers, and more vigorous use of the power to order the removal from office of bank officials found to be dishonest, reckless or incompetent, would have prevented much of the dissipation of bank assets.

The actual conduct of the Office of Bank Commissioner has not been a part of the present study of the operation of the Depositors' Guaranty Fund in Oklahoma. Nor has an attempt been made to determine whether bank examinations and the operation of the Commissioner's office were hampered by paucity of funds. However, such information as has been found in the State reports regarding the staff and expenses of the Commissioner's office is given below.

From 1913 to the repeal of the deposit guaranty law in 1923 the salary of the Bank Commissioner was fixed by law at \$4,000, and those of his 12 specifically authorized assistants at \$2,000 each. Of these assistants, one was designated by law as Assistant Bank Commissioner, and one as building and loan auditor. The remaining ten constituted the bank examining force. Since the number of operating State banks was about six hundred, and two examinations per year were required, each examiner was apparently required to make about 120 bank examinations per year.

The total cost of the Bank Commissioner's office appears to have averaged about \$44,000 per year during the operation of the deposit guaranty fund, made up of \$28,000 in salaries prescribed by law and met from the general revenue fund of the State, and about \$16,000 in other salaries, expenses of examiners, and administrative expenses met from the examination fees levied upon the banks. 3/

^{1/} The reports of the Bank Commissioner state that in 1912 the Department had one special and eight regular examiners; in 1914 ten examiners.

^{2/} The Federal Deposit Insurance Corporation in 1941 had two examiners and two assistant examiners in Oklahoma to make one examination per year of approximately 160 banks, or an average of 40 examinations per year per member of the examining force. Comparison of the examining task at present with that during the period of operation of the guaranty fund is not invalidated by differences in the size distribution of the banks examined. From 1916 to the repeal of the guaranty law, the average proportion of banks in the size groups above \$500,000 of deposits was nearly the same as the proportion in those groups of banks examined in 1941 by the Corporation.

The figure of an annual average of \$16,000 in expenses other than the salaries paid from the general revenue fund of the State is estimated from warrants issued to January 31, 1923, for the following items: salaries, \$44,674; expense of examiners, \$76,556; office supplies, \$25,721; and miscellaneous, \$73,310. House Journal, February 21, 1923, p. 774.

No figures are available of the yield of the examination fees, but an estimate for one year based on a distribution of State banks

The effectiveness of a State department of banking is limited not only by the funds placed at its disposal, but also by the economic and political climate. Throughout American history business interests have been an extremely powerful, if not dominating, element in political affairs. As a result, the persons appointed to State offices of a business regulatory character have had, in general, the same point of view and outlook and the same attitude toward business ethics as have prevailed among business men. Consequently the laxity of the examining force, in its examinations and corrective actions, probably reflected primarily the general attitude of the bankers and business men in Oklahoma. A politico-economic analysis of this period in the history of the State would be necessary to reach an opinion on the question of whether the Department of Banking could have exercised more effective supervision than it actually did.

Nevertheless, one conclusion of vital importance to the success of other systems of deposit guaranty or insurance can be drawn with certainty. That is, that dishonesty, favoritism to special interests, and speculative activities on the part of the largest banks in the system will lead to disaster, and that the supervisory authorities must be alert and vigorous in watching the policies of the banks in which the risk is concentrated.

according to capital stock and the scale of examination fees indicates that collections probably averaged less than \$20,000 per year.

For the biennium 1917-1919 a total of \$127,000 was appropriated for the Department of Banking (Sixth Biennial Report of the Bank Commissioner). However, this included \$30,000 for contingent expenses, which may have been used only in part.

CLOSING OF THE GUARANTY FUND

Oklahoma was the first of eight States to create deposit insurance systems during the period 1908-1917. It was also the first of the eight States definitely to abandon the deposit guaranty plan. In 1923 all assessments and the provisions for issuing certificates and warrants were repealed, effective March 31 of that year, though the banks and their officers were not released from obligations already incurred.

The repeal of the law was followed by litigation regarding the distribution of the assets remaining in the Guaranty Fund, which delayed settlement of the affairs of the fund until 1934. In September of that year the State Supreme Court rendered a decision, which ordered that the holders of the warrants lowest in numerical order should be paid in full to the extent of the remaining funds. 1

Barnett, et al., no. 24551, Supreme Court of Oklahoma, September 11, 1934, 36 Pac. 874.



1

Table 11. NUMBER AND DEPOSITS OF STATE BANKS IN OKLAHOMA, 1908-1920

Banks grouped by amount of deposits

	Sept. 23, 1908	Nov. 10, 1910	Nov. 26, 1912	Dec. 8,	Nov. 17, 1916	Nov. 17, 1918	Dec. 29,
Number of banks - total1/	520	693	617	562	550	582	621
Banks with deposits of - \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	466 41 11	520 133 34	500 91 20	436 102 20	250 231 54	170 293 76	174 268 119
\$500,000 to \$1,000,000 \$1,000,000 to \$2,000,000 \$2,000,000 to \$5,000,000	2	5 1	6	3 1	11 4 1	31 9 3	41 14 5
			(Deposits i	n thousands	of dollars	()	
Deposits - total1/	26,587	61,612	47,775	44,589	83,983	123,594	158,960
In banks with deposits of - \$100,000 or less \$100,000 to \$250,000 \$250,000 to \$500,000	16,136 5,535 3,647	26,590 19,150 11,178	24,063 13,095 6,446	19,987 14,444 6,670	15,627 34,620 17,661	11,937 45,705 25,334	12,053 43,671 40,437
\$500,000 to \$1,000,000 \$1,000,000 to \$2,000,000 \$2,000,000 to \$5,000,000	1,269	3,362 1,332	4,171	2,307	7,33 ⁴ 6,120 2,621	20,824 11,549 8,245	27,512 19,833 15,454

I Tabulated from statements relating to individual banks, as given in the reports of the Bank Commissioner. Totals differ slightly from the figures given in summary tables for the same dates in the Commissioner's Reports.