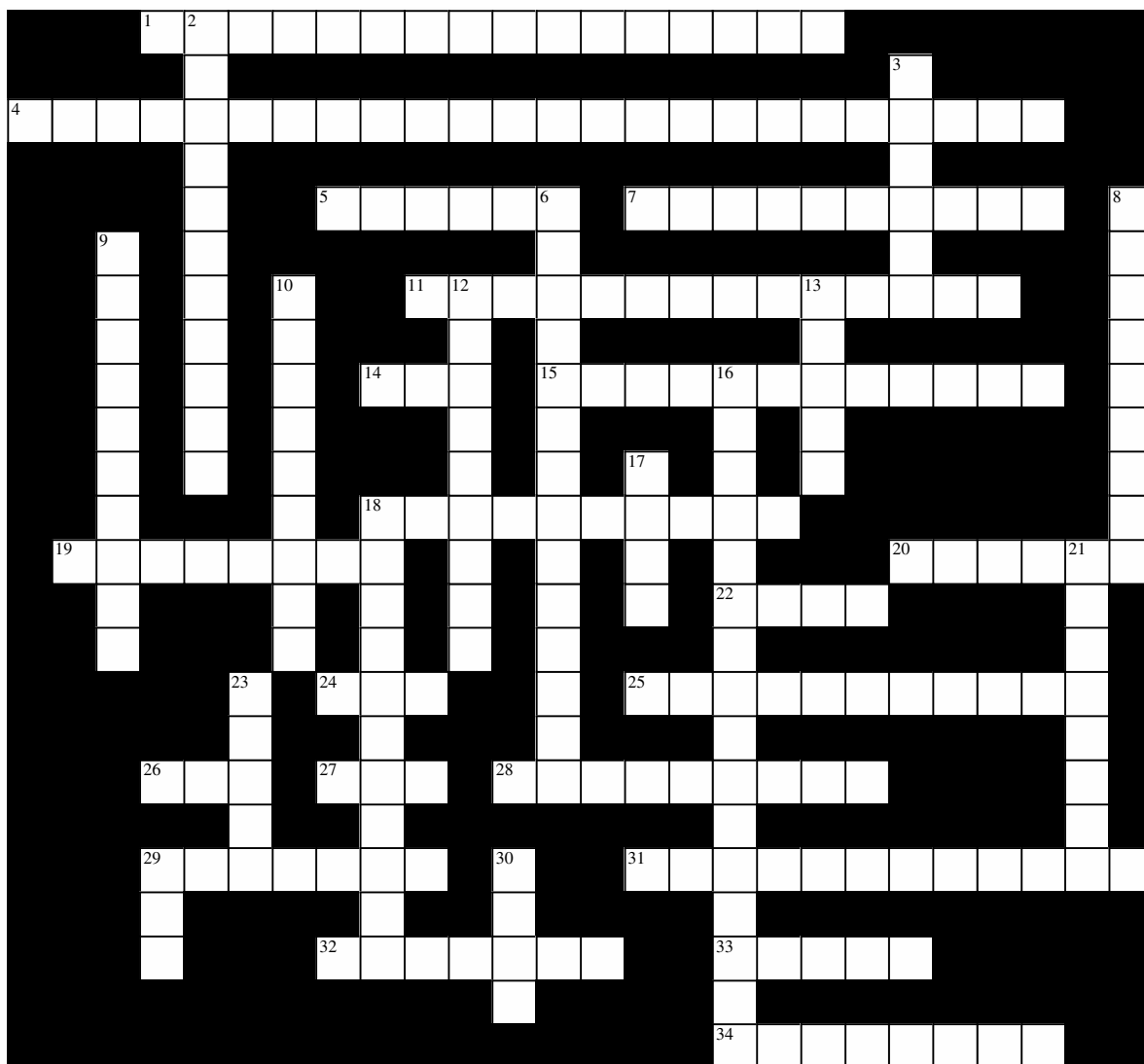


ABA BJ Puzzle of the Week: 5/26/11

CRASpeak: The Puzzle

Prize provided by Bananagrams,
the award-winning word game:
www.bananagrams-intl.com



The Community Reinvestment Act, a longstanding challenge for the industry, makes a challenging puzzle, too. CRA talk uses many terms that are almost unfathomable to the uninitiated, and this week's puzzle speaks that language. The puzzle clues are 99% the work of Illinois banker Paul Jarosz. Paul, an inveterate punster and puzzler, is senior vice-president and director of government compliance, Oxford Bank & Trust, Oak Brook, Ill. He frequently corresponds about the weekly ABABJ puzzle, and about compliance. The puzzle includes terms, rules, and even people associated with CRA, and some of what Paul came up with is *really* tough!

Fax your completed puzzle, with name, bank, title, and e-mail, by 5 PM, Wednesday, June 1, to 212-633-1165, to participate in a drawing for a game from those made by Bananagrams. Good luck! scocheo@sbsub.com

ABA BJ Puzzle of the Week: 5/26/11

CRASpeak: Across Clues

ACROSS

1. While to some this might connote "Peyton Place," to compliance and CRA officers, it's the department at your regulator that can try to settle doubts about the regulation's requirements.
4. A 24-letter CRA term that can be abbreviate as "in deep doo-doo."
5. Middle of the road in more ways than one.
7. Not the CRA law. Not the CRA regulation. But still important for understanding what the regulators expect for compliance.
11. The two-word term formerly known as "delineated community."
14. A geographic unit defined by OMB.
15. A passing grade on a CRA exam.
18. A two-word CRA requirement that appears to be the antithesis of the Bank Secrecy Act.
19. Former printing company executive, he rose to head Senate Banking Committee and was "father" of CRA. Also known for his "Golden Fleece" awards.
20. Comptroller of the Currency during Clinton years, he took the lead on CRA reform, including hearings featuring colored lights for speaker timing. Now he looks on banking from a Promontory.
22. To a Trekkie, the pasty-faced android bridge officer about the New Generation Enterprise. To a CRA officer, something to be accumulated and reported.
24. Cabinet-level federal entity where referrals by regulators may wind up when CRA exams generate fair-lending concerns.
25. US chief executive when CRA had its last major update. Not really sure he felt banks' pain.
26. A financial institution that is sort of like a teenager, that is, not a child, but not big either. Change one letter and you'd have a computer cable designation.
27. To Julius Caesar, this meant "1,051." Abbreviated term is of major interest to CRA officers.
28. Perhaps your favorite subject in grade school, but actually something created by the U.S. Bureau of the Census.
29. The most important leg of CRA's three-legged stool.
31. Chicago-based activist known by some as "The Mother of CRA." A fitting first name, given she came from "The Windy City."
32. A CRA Catch-22: Don't do well on your CRA exam and you may not be able to open branches. Yet if you open more branches, you may ace this test.
33. High-profile community organization ensnared in a hidden camera sting and subsequently liquidated in 2010. Apparently didn't fall far from the tree.
34. Type of agreement between banks and community groups regarding goals for lending and investing.

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CRASpeak: Down Clues

DOWN

2. To a lender, a loan balance not yet paid. To an ag banker, used to describe a farmer in the middle of his field. But for this puzzle, it's a rating that includes bragging rights.
3. President when CRA began, he makes such a Habitat of using a hammer that he is now an unofficial celebrity spokesman for a major beneficiary of CRA.
6. Found on many a grammar school report card and a few Reports of Examination.
8. This wouldn't be possible without USPS, Exam Council, and, sometimes, a GPS.
9. An early morning assignment in a military boot camp, but a date that lives in infamy for many CRA officers. (Warning: This answer is dated.)
10. A colorful term used to describe the practice of arbitrarily excluding whole neighborhoods from access to credit.
12. "An institution that, as of Dec. 31 of either of the prior two calendar years, had assets of less than \$1.122 billion."
13. Censusal term, it's generally comprised of a population of 1,500 to 8,000 persons.
16. Credits that may not be big in size, but may pay off in big CRA dividends.
17. Abbreviation for a new warren of regulators who don't officially figure directly in CRA oversight and regulation, but don't count them out, either.
18. "_____ not paperwork" was the rallying point for the Clinton Administration's revamp of CRA regulations.
21. To a foodie, the popular West Coast hamburger chain with the double-directional name; to a CRA officer, an exercise with a numerator and denominator.
23. Types of banking markets where community reinvestment issues surfaced, raising congressional concerns and eventually spawning regulation.
29. To a personal banker or lender, a type of business organization; to an aficionado, an affordable gas guzzler; and to a CRA officer, something that's calculated quarterly.
30. Type of lending regulation that plays a role in CRA evaluation.

Thanks to Paul Jarosz for providing the clues for this puzzle. If you have an idea for a banking-themed puzzle of some kind, please share it with us at scocheo@sbpub.com