

## Libor memo

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**Item ID:** 31981  
**From:** Timothy.Lee@fhfaig.gov  
**To:** Bloch, David (b) (6)  
**Subject:** Libor memo  
**Sent:** October 4, 2012 6:00 PM  
**Received:** October 4, 2012 5:59 PM

Do we want to add something dry but totally caustic about the banks as underwriters of floating rate bonds, like: "FHFA-OIG is unaware of any disclosures by the LIBOR contributors, in their role as dealers and underwriters of floating-rate securities purchased by the Enterprises, that they may manipulate LIBOR for their own interests, which may conflict with those of their customers?" Sent from my Windows Phone

## LIBOR memo

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**Item ID:** 31983  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Cc:** Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>  
**Subject:** LIBOR memo  
**Sent:** October 5, 2012 9:26 AM  
**Received:** October 5, 2012 9:26 AM

I freshened up the table and last paragraph on page 6. See what you think.

[https://sharepoint.fhfa.ig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memorandum%20Oct%204.docx](https://sharepoint.fhfa.ig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memorandum%20Oct%204.docx) ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

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**Item ID:** 31984  
**From:** Bloch, David (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Wu, Simon (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** October 5, 2012 9:27 AM  
**Received:** October 5, 2012 9:27 AM

I am ready to talk after your BoA call. From: Lee, Timothy Sent: Friday, October 05, 2012 9:27 AM To: Bloch, David  
Cc: Wu, Simon Subject: LIBOR memo I freshened up the table and last paragraph on page 6. See what you think.  
[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memorandum%20Oct%204.docx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memorandum%20Oct%204.docx) ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

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**Item ID:** 31985  
**From:** Wu, Simon (b) (6)  
**To:** Bloch, David (b) (6), Lee, Timothy <Timothy.Lee@fhfaig.gov>  
**Subject:** RE: LIBOR memo  
**Sent:** October 5, 2012 9:33 AM  
**Received:** October 5, 2012 9:33 AM

I was yesterday so i will read this morning.

Simon Wu

Chief Economist

Office of Inspector General

The Federal Housing Finance Agency

Sent from my Windows Phone

-----Original Message-----

From: Bloch, David

Sent: 10/5/2012 9:27 AM

To: Lee, Timothy

Cc: Wu, Simon

Subject: RE: LIBOR memo

## RE: LIBOR memo

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**Item ID:** 31986  
**From:** Wu, Simon (b) (6)  
**To:** Bloch, David (b) (6), Lee, Timothy <Timothy.Lee@fhfaig.gov>  
**Subject:** RE: LIBOR memo  
**Sent:** October 5, 2012 9:56 AM  
**Received:** October 5, 2012 9:56 AM

Looking good...

Simon Z. Wu, Ph.D.

Chief Economist

Office of Inspector General

Federal Housing Finance Agency

400 7th Street, SW

Washington, DC 20024

Voice (b) (6)

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-----Original Message-----

From: Wu, Simon

Sent: Friday, October 05, 2012 9:33 AM

To: Bloch, David; Lee, Timothy

Subject: RE: LIBOR memo

I was yesterday so i will read this morning.

Simon Wu

Chief Economist

Office of Inspector General

The Federal Housing Finance Agency

Sent from my Windows Phone

-----Original Message-----

From: Bloch, David

Sent: 10/5/2012 9:27 AM

To: Lee, Timothy

Cc: Wu, Simon

Subject: RE: LIBOR memo

**Attachment #1**

**LIBOR action memorandum Oct 4\_Wu Comments.docx**

**Original view**

9 pages (displayed on pages 3 to 11)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October XX, 2012

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(b) (5)

## LIBOR memo

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**Item ID:** 31987  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>, Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Phillips, Wesley </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1881bcb698c45b096269b8112f87787-Wesley Phil>, Rhinesmith, Alan </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=98d654fcd31f48f7887a69bf4cc5b12d-Alan Rhines>  
**Subject:** LIBOR memo  
**Sent:** October 5, 2012 12:11 PM  
**Received:** October 5, 2012 12:11 PM

Hi Old Salt, Attached is a draft that we deem ready to forward to Steve for his review. The edits compared to yesterday evening are fairly minor, though you should take a look at the table on page 6, as well as insertions on the bottoms of pages 6 and 7. Of course, we are pleased to discuss any questions that arise. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR action memorandum draft for Steve.docx**

**Original view**

8 pages (displayed on pages 3 to 10)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

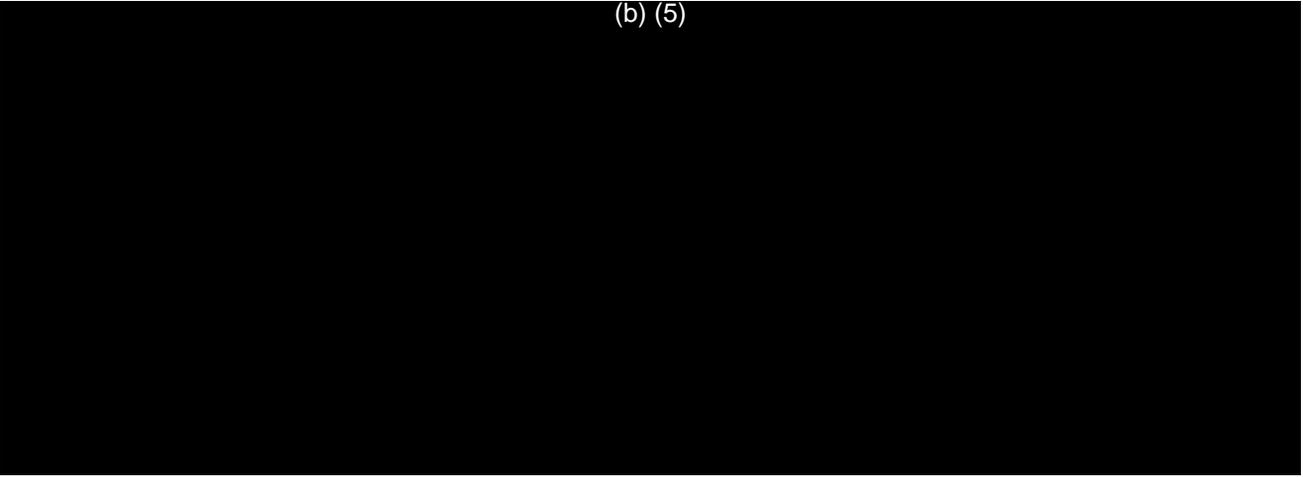
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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

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(b) (5)



In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR,<sup>1</sup> a market-standard index used to calculate payments on over \$300 trillion of financial instruments and described as “the most important figure in finance,”<sup>2</sup> to its own advantage. According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>3</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>4</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.

Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.”<sup>5</sup>

## Background

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>6</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises' ability to remain viable entities through Senior Preferred Share Purchase Agreements ("PSPAs") with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>7</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>8</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets, on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders' market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- **Floating rate bonds.** Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship, and still holds \$132 billion in such instruments as of June 30, 2012.<sup>9</sup>
- **Interest rate swaps.** Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>a</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in

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<sup>a</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of a specified index. LIBOR is the principal index used for US dollar investments, including floating rate bonds and interest rate derivatives.<sup>10</sup> It is determined by daily polls of 16 leading financial institutions, which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining eight submissions.<sup>11</sup>

### FHFA-OIG Analysis

(b) (5)

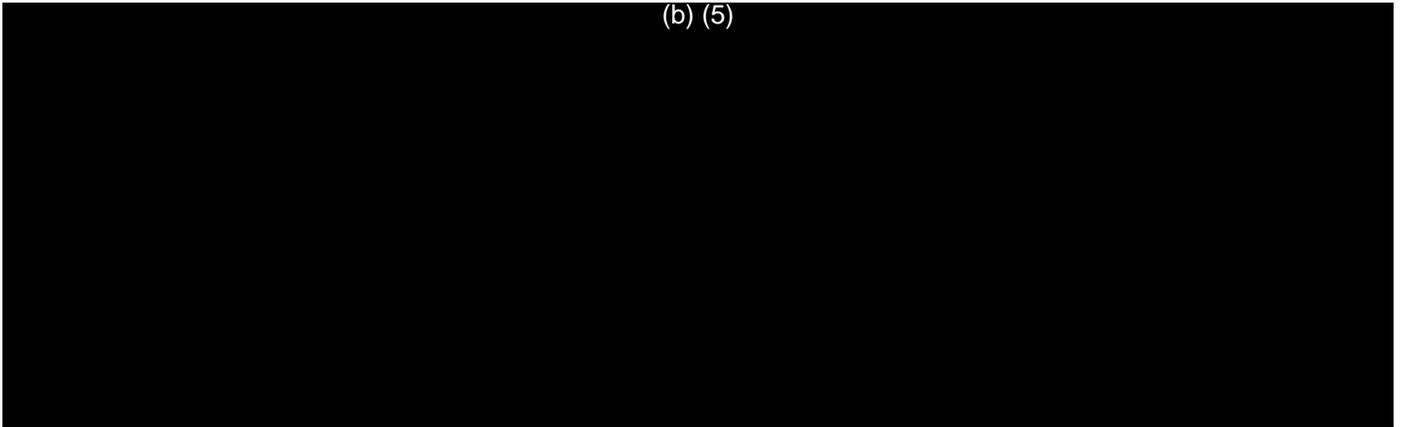
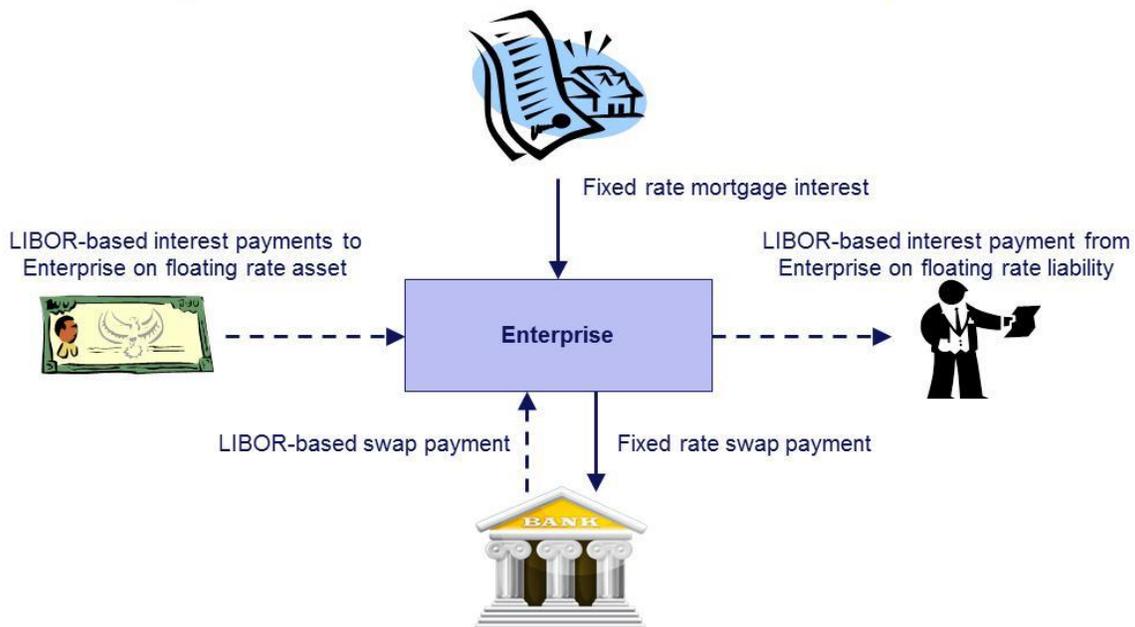


Figure 1. LIBOR-Based Payments to and From the Enterprises



(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

## One more thing...

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**Item ID:** 31989  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>  
**Subject:** One more thing...  
**Sent:** October 5, 2012 6:14 PM  
**Received:** October 5, 2012 6:14 PM

Hi guys, I finished up footnote d, including the necessary research. To back it up, the Excel file has a new sheet, "Offering Memoranda", which is really worth a look because I think it could point to quite the little playground for the RMBS Working Group, the SEC (1933 Act), or perhaps NYSAG (Martin Act). Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR action memorandum draft for Steve.docx**

**Original view**

9 pages (displayed on pages 3 to 11)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

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(b) (5)

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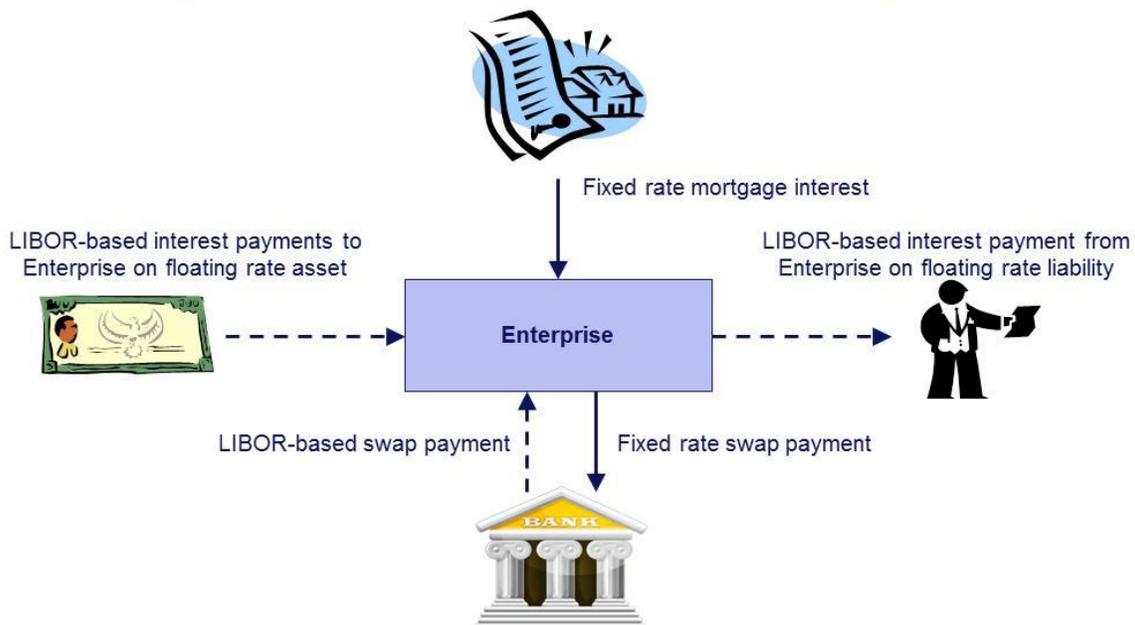
stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

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### FHFA-OIG Analysis

(b) (5)

Figure 1. LIBOR-Based Payments to and From the Enterprises



(b) (5)

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(b) (5)

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<sup>e</sup> FHFA-OIG's Office of Evaluations, led by George Grob, and Office of Policy, Oversight and Review, led by Richard Parker, shared in the creation of this memorandum. Research and analysis were led by Timothy Lee, Senior Policy Advisor, David P. Bloch, Investigative Counsel, and Simon Z. Wu, Chief Economist. Valuable assistance was also provided by (b) (6) Auditor.

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- <sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012
- <sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>5</sup> University of Pennsylvania, "[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)," July 18, 2012
- <sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)," September 7, 2008, p.6.
- <sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)," January 20, 2010
- <sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddie.mac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddie.mac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)," July 4, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2
- <sup>19</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010.
- <sup>20</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

**Attachment #2**

**LIBOR proposal.xlsx**

**Original view**

211 pages (displayed on pages 13 to 223)









#NAME? #NAME? #NAME? #NAME? #NAME? #NAME? #NAME? #NAME? #NAME?  
#NAME? #NAME? #NAME? #NAME? #NAME? #NAME? #NAME? #NAME? #NAME?

30-Jun-11 30-Sep-11 31-Dec-11 31-Mar-12 30-Jun-12

205,084	193,882	186,757	206,307	229,227
161,151	179,808	229,695	250,322	265,593
2,552	6,997	9,622	18,673	20,922
46,485	21,071	(33,316)	(25,342)	(15,444)

215,758	220,668	211,808	248,453	260,428
321,870	293,683	289,335	296,573	292,660
3,275	2,275	2,750	2,400	2,350
109,387	75,290	80,277	50,520	34,582

155,872	96,361	46,961	25,178	19,138
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326,384	318,353	310,143	296,886	285,982
52%	52%	53%	54%	55%
169,673	166,610	165,685	160,482	158,349

133,048	128,918	121,676	114,306	106,577
144,053	141,548	139,556	134,484	132,225
52%	52%	53%	54%	55%

313,726	308,158	305,241	294,966	290,574
TRUE	TRUE	TRUE	TRUE	TRUE

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#NAME? #NAME? #NAME? #NAME? #NAME?  
#NAME? #NAME? #NAME? #NAME? #NAME?

Federal  
Reserve  
ED  
Deposits  
Less  
LIBOR, 1  
month  
tenor

**4-Jan-00 through 14-Jun-07**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**15-jun-07 through 7-Sep-08**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**6-sep-08 through 27-jun-12**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

Date	1 month			Date	3 month	
	1 month LIBOR	Fed ED Deposit	1 month Spread		3 month LIBOR	Fed ED Deposit
4-Jan-00	#NAME?	#NAME?	#NAME?	4-Jan-00	#NAME?	#NAME?
5-Jan-00	#NAME?	#NAME?	#NAME?	5-Jan-00	#NAME?	#NAME?
6-Jan-00	#NAME?	#NAME?	#NAME?	6-Jan-00	#NAME?	#NAME?
7-Jan-00	#NAME?	#NAME?	#NAME?	7-Jan-00	#NAME?	#NAME?
10-Jan-00	#NAME?	#NAME?	#NAME?	10-Jan-00	#NAME?	#NAME?
11-Jan-00	#NAME?	#NAME?	#NAME?	11-Jan-00	#NAME?	#NAME?
12-Jan-00	#NAME?	#NAME?	#NAME?	12-Jan-00	#NAME?	#NAME?
13-Jan-00	#NAME?	#NAME?	#NAME?	13-Jan-00	#NAME?	#NAME?
14-Jan-00	#NAME?	#NAME?	#NAME?	14-Jan-00	#NAME?	#NAME?
18-Jan-00	#NAME?	#NAME?	#NAME?	18-Jan-00	#NAME?	#NAME?
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20-Jan-00	#NAME?	#NAME?	#NAME?	20-Jan-00	#NAME?	#NAME?
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24-Jan-00	#NAME?	#NAME?	#NAME?	24-Jan-00	#NAME?	#NAME?
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28-Jan-00	#NAME?	#NAME?	#NAME?	28-Jan-00	#NAME?	#NAME?





16-Jun-00	#NAME?	#NAME?	#NAME?	16-Jun-00	#NAME?	#NAME?
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27-Jun-00	#NAME?	#NAME?	#NAME?	27-Jun-00	#NAME?	#NAME?
28-Jun-00	#NAME?	#NAME?	#NAME?	28-Jun-00	#NAME?	#NAME?
29-Jun-00	#NAME?	#NAME?	#NAME?	29-Jun-00	#NAME?	#NAME?
30-Jun-00	#NAME?	#NAME?	#NAME?	30-Jun-00	#NAME?	#NAME?
3-Jul-00	#NAME?	#NAME?	#NAME?	3-Jul-00	#NAME?	#NAME?
5-Jul-00	#NAME?	#NAME?	#NAME?	5-Jul-00	#NAME?	#NAME?
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28-Oct-11	#NAME?	#NAME?	#NAME?	28-Oct-11	#NAME?	#NAME?
31-Oct-11	#NAME?	#NAME?	#NAME?	31-Oct-11	#NAME?	#NAME?
1-Nov-11	#NAME?	#NAME?	#NAME?	1-Nov-11	#NAME?	#NAME?
2-Nov-11	#NAME?	#NAME?	#NAME?	2-Nov-11	#NAME?	#NAME?
3-Nov-11	#NAME?	#NAME?	#NAME?	3-Nov-11	#NAME?	#NAME?
4-Nov-11	#NAME?	#NAME?	#NAME?	4-Nov-11	#NAME?	#NAME?
7-Nov-11	#NAME?	#NAME?	#NAME?	7-Nov-11	#NAME?	#NAME?
8-Nov-11	#NAME?	#NAME?	#NAME?	8-Nov-11	#NAME?	#NAME?
9-Nov-11	#NAME?	#NAME?	#NAME?	9-Nov-11	#NAME?	#NAME?
10-Nov-11	#NAME?	#NAME?	#NAME?	10-Nov-11	#NAME?	#NAME?
14-Nov-11	#NAME?	#NAME?	#NAME?	14-Nov-11	#NAME?	#NAME?
15-Nov-11	#NAME?	#NAME?	#NAME?	15-Nov-11	#NAME?	#NAME?
16-Nov-11	#NAME?	#NAME?	#NAME?	16-Nov-11	#NAME?	#NAME?
17-Nov-11	#NAME?	#NAME?	#NAME?	17-Nov-11	#NAME?	#NAME?
18-Nov-11	#NAME?	#NAME?	#NAME?	18-Nov-11	#NAME?	#NAME?
21-Nov-11	#NAME?	#NAME?	#NAME?	21-Nov-11	#NAME?	#NAME?
22-Nov-11	#NAME?	#NAME?	#NAME?	22-Nov-11	#NAME?	#NAME?
23-Nov-11	#NAME?	#NAME?	#NAME?	23-Nov-11	#NAME?	#NAME?
25-Nov-11	#NAME?	#NAME?	#NAME?	25-Nov-11	#NAME?	#NAME?
28-Nov-11	#NAME?	#NAME?	#NAME?	28-Nov-11	#NAME?	#NAME?
29-Nov-11	#NAME?	#NAME?	#NAME?	29-Nov-11	#NAME?	#NAME?
30-Nov-11	#NAME?	#NAME?	#NAME?	30-Nov-11	#NAME?	#NAME?
1-Dec-11	#NAME?	#NAME?	#NAME?	1-Dec-11	#NAME?	#NAME?
2-Dec-11	#NAME?	#NAME?	#NAME?	2-Dec-11	#NAME?	#NAME?
5-Dec-11	#NAME?	#NAME?	#NAME?	5-Dec-11	#NAME?	#NAME?
6-Dec-11	#NAME?	#NAME?	#NAME?	6-Dec-11	#NAME?	#NAME?
7-Dec-11	#NAME?	#NAME?	#NAME?	7-Dec-11	#NAME?	#NAME?
8-Dec-11	#NAME?	#NAME?	#NAME?	8-Dec-11	#NAME?	#NAME?
9-Dec-11	#NAME?	#NAME?	#NAME?	9-Dec-11	#NAME?	#NAME?
12-Dec-11	#NAME?	#NAME?	#NAME?	12-Dec-11	#NAME?	#NAME?
13-Dec-11	#NAME?	#NAME?	#NAME?	13-Dec-11	#NAME?	#NAME?
14-Dec-11	#NAME?	#NAME?	#NAME?	14-Dec-11	#NAME?	#NAME?
15-Dec-11	#NAME?	#NAME?	#NAME?	15-Dec-11	#NAME?	#NAME?
16-Dec-11	#NAME?	#NAME?	#NAME?	16-Dec-11	#NAME?	#NAME?
19-Dec-11	#NAME?	#NAME?	#NAME?	19-Dec-11	#NAME?	#NAME?
20-Dec-11	#NAME?	#NAME?	#NAME?	20-Dec-11	#NAME?	#NAME?
21-Dec-11	#NAME?	#NAME?	#NAME?	21-Dec-11	#NAME?	#NAME?
22-Dec-11	#NAME?	#NAME?	#NAME?	22-Dec-11	#NAME?	#NAME?
23-Dec-11	#NAME?	#NAME?	#NAME?	23-Dec-11	#NAME?	#NAME?
28-Dec-11	#NAME?	#NAME?	#NAME?	28-Dec-11	#NAME?	#NAME?

29-Dec-11	#NAME?	#NAME?	#NAME?	29-Dec-11	#NAME?	#NAME?
30-Dec-11	#NAME?	#NAME?	#NAME?	30-Dec-11	#NAME?	#NAME?
3-Jan-12	#NAME?	#NAME?	#NAME?	3-Jan-12	#NAME?	#NAME?
4-Jan-12	#NAME?	#NAME?	#NAME?	4-Jan-12	#NAME?	#NAME?
5-Jan-12	#NAME?	#NAME?	#NAME?	5-Jan-12	#NAME?	#NAME?
6-Jan-12	#NAME?	#NAME?	#NAME?	6-Jan-12	#NAME?	#NAME?
9-Jan-12	#NAME?	#NAME?	#NAME?	9-Jan-12	#NAME?	#NAME?
10-Jan-12	#NAME?	#NAME?	#NAME?	10-Jan-12	#NAME?	#NAME?
11-Jan-12	#NAME?	#NAME?	#NAME?	11-Jan-12	#NAME?	#NAME?
12-Jan-12	#NAME?	#NAME?	#NAME?	12-Jan-12	#NAME?	#NAME?
13-Jan-12	#NAME?	#NAME?	#NAME?	13-Jan-12	#NAME?	#NAME?
16-Jan-12	#NAME?	#NAME?	#NAME?	16-Jan-12	#NAME?	#NAME?
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18-Jan-12	#NAME?	#NAME?	#NAME?	18-Jan-12	#NAME?	#NAME?
19-Jan-12	#NAME?	#NAME?	#NAME?	19-Jan-12	#NAME?	#NAME?
20-Jan-12	#NAME?	#NAME?	#NAME?	20-Jan-12	#NAME?	#NAME?
23-Jan-12	#NAME?	#NAME?	#NAME?	23-Jan-12	#NAME?	#NAME?
24-Jan-12	#NAME?	#NAME?	#NAME?	24-Jan-12	#NAME?	#NAME?
25-Jan-12	#NAME?	#NAME?	#NAME?	25-Jan-12	#NAME?	#NAME?
26-Jan-12	#NAME?	#NAME?	#NAME?	26-Jan-12	#NAME?	#NAME?
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31-Jan-12	#NAME?	#NAME?	#NAME?	31-Jan-12	#NAME?	#NAME?
1-Feb-12	#NAME?	#NAME?	#NAME?	1-Feb-12	#NAME?	#NAME?
2-Feb-12	#NAME?	#NAME?	#NAME?	2-Feb-12	#NAME?	#NAME?
3-Feb-12	#NAME?	#NAME?	#NAME?	3-Feb-12	#NAME?	#NAME?
6-Feb-12	#NAME?	#NAME?	#NAME?	6-Feb-12	#NAME?	#NAME?
7-Feb-12	#NAME?	#NAME?	#NAME?	7-Feb-12	#NAME?	#NAME?
8-Feb-12	#NAME?	#NAME?	#NAME?	8-Feb-12	#NAME?	#NAME?
9-Feb-12	#NAME?	#NAME?	#NAME?	9-Feb-12	#NAME?	#NAME?
10-Feb-12	#NAME?	#NAME?	#NAME?	10-Feb-12	#NAME?	#NAME?
13-Feb-12	#NAME?	#NAME?	#NAME?	13-Feb-12	#NAME?	#NAME?
14-Feb-12	#NAME?	#NAME?	#NAME?	14-Feb-12	#NAME?	#NAME?
15-Feb-12	#NAME?	#NAME?	#NAME?	15-Feb-12	#NAME?	#NAME?
16-Feb-12	#NAME?	#NAME?	#NAME?	16-Feb-12	#NAME?	#NAME?
17-Feb-12	#NAME?	#NAME?	#NAME?	17-Feb-12	#NAME?	#NAME?
20-Feb-12	#NAME?	#NAME?	#NAME?	20-Feb-12	#NAME?	#NAME?
21-Feb-12	#NAME?	#NAME?	#NAME?	21-Feb-12	#NAME?	#NAME?
22-Feb-12	#NAME?	#NAME?	#NAME?	22-Feb-12	#NAME?	#NAME?
23-Feb-12	#NAME?	#NAME?	#NAME?	23-Feb-12	#NAME?	#NAME?
24-Feb-12	#NAME?	#NAME?	#NAME?	24-Feb-12	#NAME?	#NAME?
27-Feb-12	#NAME?	#NAME?	#NAME?	27-Feb-12	#NAME?	#NAME?
28-Feb-12	#NAME?	#NAME?	#NAME?	28-Feb-12	#NAME?	#NAME?
29-Feb-12	#NAME?	#NAME?	#NAME?	29-Feb-12	#NAME?	#NAME?
1-Mar-12	#NAME?	#NAME?	#NAME?	1-Mar-12	#NAME?	#NAME?
2-Mar-12	#NAME?	#NAME?	#NAME?	2-Mar-12	#NAME?	#NAME?
5-Mar-12	#NAME?	#NAME?	#NAME?	5-Mar-12	#NAME?	#NAME?

6-Mar-12	#NAME?	#NAME?	#NAME?	6-Mar-12	#NAME?	#NAME?
7-Mar-12	#NAME?	#NAME?	#NAME?	7-Mar-12	#NAME?	#NAME?
8-Mar-12	#NAME?	#NAME?	#NAME?	8-Mar-12	#NAME?	#NAME?
9-Mar-12	#NAME?	#NAME?	#NAME?	9-Mar-12	#NAME?	#NAME?
12-Mar-12	#NAME?	#NAME?	#NAME?	12-Mar-12	#NAME?	#NAME?
13-Mar-12	#NAME?	#NAME?	#NAME?	13-Mar-12	#NAME?	#NAME?
14-Mar-12	#NAME?	#NAME?	#NAME?	14-Mar-12	#NAME?	#NAME?
15-Mar-12	#NAME?	#NAME?	#NAME?	15-Mar-12	#NAME?	#NAME?
16-Mar-12	#NAME?	#NAME?	#NAME?	16-Mar-12	#NAME?	#NAME?
19-Mar-12	#NAME?	#NAME?	#NAME?	19-Mar-12	#NAME?	#NAME?
20-Mar-12	#NAME?	#NAME?	#NAME?	20-Mar-12	#NAME?	#NAME?
21-Mar-12	#NAME?	#NAME?	#NAME?	21-Mar-12	#NAME?	#NAME?
22-Mar-12	#NAME?	#NAME?	#NAME?	22-Mar-12	#NAME?	#NAME?
23-Mar-12	#NAME?	#NAME?	#NAME?	23-Mar-12	#NAME?	#NAME?
26-Mar-12	#NAME?	#NAME?	#NAME?	26-Mar-12	#NAME?	#NAME?
27-Mar-12	#NAME?	#NAME?	#NAME?	27-Mar-12	#NAME?	#NAME?
28-Mar-12	#NAME?	#NAME?	#NAME?	28-Mar-12	#NAME?	#NAME?
29-Mar-12	#NAME?	#NAME?	#NAME?	29-Mar-12	#NAME?	#NAME?
30-Mar-12	#NAME?	#NAME?	#NAME?	30-Mar-12	#NAME?	#NAME?
2-Apr-12	#NAME?	#NAME?	#NAME?	2-Apr-12	#NAME?	#NAME?
3-Apr-12	#NAME?	#NAME?	#NAME?	3-Apr-12	#NAME?	#NAME?
4-Apr-12	#NAME?	#NAME?	#NAME?	4-Apr-12	#NAME?	#NAME?
5-Apr-12	#NAME?	#NAME?	#NAME?	5-Apr-12	#NAME?	#NAME?
10-Apr-12	#NAME?	#NAME?	#NAME?	10-Apr-12	#NAME?	#NAME?
11-Apr-12	#NAME?	#NAME?	#NAME?	11-Apr-12	#NAME?	#NAME?
12-Apr-12	#NAME?	#NAME?	#NAME?	12-Apr-12	#NAME?	#NAME?
13-Apr-12	#NAME?	#NAME?	#NAME?	13-Apr-12	#NAME?	#NAME?
16-Apr-12	#NAME?	#NAME?	#NAME?	16-Apr-12	#NAME?	#NAME?
17-Apr-12	#NAME?	#NAME?	#NAME?	17-Apr-12	#NAME?	#NAME?
18-Apr-12	#NAME?	#NAME?	#NAME?	18-Apr-12	#NAME?	#NAME?
19-Apr-12	#NAME?	#NAME?	#NAME?	19-Apr-12	#NAME?	#NAME?
20-Apr-12	#NAME?	#NAME?	#NAME?	20-Apr-12	#NAME?	#NAME?
23-Apr-12	#NAME?	#NAME?	#NAME?	23-Apr-12	#NAME?	#NAME?
24-Apr-12	#NAME?	#NAME?	#NAME?	24-Apr-12	#NAME?	#NAME?
25-Apr-12	#NAME?	#NAME?	#NAME?	25-Apr-12	#NAME?	#NAME?
26-Apr-12	#NAME?	#NAME?	#NAME?	26-Apr-12	#NAME?	#NAME?
27-Apr-12	#NAME?	#NAME?	#NAME?	27-Apr-12	#NAME?	#NAME?
30-Apr-12	#NAME?	#NAME?	#NAME?	30-Apr-12	#NAME?	#NAME?
1-May-12	#NAME?	#NAME?	#NAME?	1-May-12	#NAME?	#NAME?
2-May-12	#NAME?	#NAME?	#NAME?	2-May-12	#NAME?	#NAME?
3-May-12	#NAME?	#NAME?	#NAME?	3-May-12	#NAME?	#NAME?
4-May-12	#NAME?	#NAME?	#NAME?	4-May-12	#NAME?	#NAME?
8-May-12	#NAME?	#NAME?	#NAME?	8-May-12	#NAME?	#NAME?
9-May-12	#NAME?	#NAME?	#NAME?	9-May-12	#NAME?	#NAME?
#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?
#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?
#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?





















































































#NAME?

















































USD3MTD156N		USD1MTD156N		DED1		DED3	
lin	Percent	lin	Percent	lin	Percent	lin	Percent
D	Daily	D	Daily	D	Daily	D	Daily
1/1/2000	1986-01-02	1/1/2000	1986-01-02	1/1/2000	1971-01-04	1/1/2000	1971-01-04 to 2012-09
<a href="#">3-Month London Inter</a>		<a href="#">1-Month London Inter</a>		<a href="#">1-Month Eurodollar De</a>		<a href="#">3-Month Eurodollar Deposit Rate</a>	
British Bankers' Associ		British Bankers' Associ		Board of Governors of		Board of Governors of the Federal	
date	value	date	value	date	value	date	value
1/4/2000	6.0	1/4/2000	5.8	1/3/2000	5.7	1/3/2000	5.9
1/5/2000	6.0	1/5/2000	5.8	1/4/2000	5.7	1/4/2000	5.9
1/6/2000	6.0	1/6/2000	5.8	1/5/2000	5.7	1/5/2000	5.9
1/7/2000	6.0	1/7/2000	5.8	1/6/2000	5.7	1/6/2000	5.9
#####	6.0	#####	5.8	1/7/2000	5.7	1/7/2000	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	#N/A	#####	#N/A
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.9	#####	5.7	#####	5.9
#####	6.1	#####	5.9	#####	5.8	#####	6.0
2/1/2000	6.1	2/1/2000	5.9	#####	5.8	#####	6.0
2/2/2000	6.1	2/2/2000	5.9	2/1/2000	5.8	2/1/2000	6.0
2/3/2000	6.1	2/3/2000	5.9	2/2/2000	5.9	2/2/2000	6.1
2/4/2000	6.1	2/4/2000	5.9	2/3/2000	5.8	2/3/2000	6.0
2/7/2000	6.1	2/7/2000	5.9	2/4/2000	5.8	2/4/2000	6.0
2/8/2000	6.1	2/8/2000	5.9	2/7/2000	5.8	2/7/2000	6.0
2/9/2000	6.1	2/9/2000	5.9	2/8/2000	5.8	2/8/2000	6.0
#####	6.1	#####	5.9	2/9/2000	5.8	2/9/2000	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	#N/A	#####	#N/A
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0





#####	6.7 #####	6.6 7/7/2000	6.5 7/7/2000	6.7
#####	6.7 #####	6.6 #####	6.6 #####	6.7
#####	6.7 #####	6.6 #####	6.6 #####	6.7
#####	6.7 #####	6.6 #####	6.6 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
8/1/2000	6.7 8/1/2000	6.6 #####	6.5 #####	6.7
8/2/2000	6.7 8/2/2000	6.6 #####	6.5 #####	6.7
8/3/2000	6.7 8/3/2000	6.6 #####	6.5 #####	6.7
8/4/2000	6.7 8/4/2000	6.6 #####	6.5 #####	6.7
8/7/2000	6.7 8/7/2000	6.6 #####	6.5 #####	6.7
8/8/2000	6.7 8/8/2000	6.6 8/1/2000	6.5 8/1/2000	6.7
8/9/2000	6.7 8/9/2000	6.6 8/2/2000	6.5 8/2/2000	6.7
#####	6.7 #####	6.6 8/3/2000	6.5 8/3/2000	6.7
#####	6.7 #####	6.6 8/4/2000	6.5 8/4/2000	6.6
#####	6.7 #####	6.6 8/7/2000	6.5 8/7/2000	6.6
#####	6.7 #####	6.6 8/8/2000	6.5 8/8/2000	6.6
#####	6.7 #####	6.6 8/9/2000	6.5 8/9/2000	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
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#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
9/1/2000	6.7 9/1/2000	6.6 #####	6.5 #####	6.6
9/4/2000	6.7 9/4/2000	6.6 #####	6.5 #####	6.6
9/5/2000	6.7 9/5/2000	6.6 #####	6.5 #####	6.6
9/6/2000	6.7 9/6/2000	6.6 #####	6.5 #####	6.6
9/7/2000	6.7 9/7/2000	6.6 #####	6.5 #####	6.6
9/8/2000	6.7 9/8/2000	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 9/1/2000	6.5 9/1/2000	6.6
#####	6.7 #####	6.6 9/4/2000	#N/A 9/4/2000 #N/A	
#####	6.7 #####	6.6 9/5/2000	6.5 9/5/2000	6.6
#####	6.7 #####	6.6 9/6/2000	6.5 9/6/2000	6.6
#####	6.7 #####	6.6 9/7/2000	6.5 9/7/2000	6.6
#####	6.7 #####	6.6 9/8/2000	6.5 9/8/2000	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6



#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	#N/A	#####	#N/A
#####	6.7	#####	6.8	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	6.5	#####	6.7
#####	6.6	#####	6.7	#####	6.5	#####	6.7
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.6	#####	6.6	#####	6.5
#####	6.5	#####	6.6	#####	6.6	#####	6.5
#####	6.5	#####	6.6	#####	6.6	#####	6.5
#####	6.4	#####	6.6	#####	6.6	#####	6.5
#####	6.4	#####	6.6	#####	6.6	#####	6.4
#####	6.4	#####	6.6	#####	6.5	#####	6.4
1/2/2001	6.4	1/2/2001	6.5	#####	6.5	#####	6.4
1/3/2001	6.3	1/3/2001	6.5	#####	6.6	#####	6.4
1/4/2001	5.9	1/4/2001	6.1	#####	6.6	#####	6.3
1/5/2001	5.7	1/5/2001	5.9	#####	6.6	#####	6.3
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#####	1.9	#####	1.8	4/3/2002	1.8	4/3/2002	1.9
5/1/2002	1.9	5/1/2002	1.8	4/4/2002	1.8	4/4/2002	1.9
5/2/2002	1.9	5/2/2002	1.8	4/5/2002	1.8	4/5/2002	1.9
5/3/2002	1.9	5/3/2002	1.8	4/8/2002	1.8	4/8/2002	1.9
5/7/2002	1.9	5/7/2002	1.8	4/9/2002	1.8	4/9/2002	1.9
5/8/2002	1.9	5/8/2002	1.8	#####	1.8	#####	1.9
5/9/2002	1.9	5/9/2002	1.8	#####	1.8	#####	1.9
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1/3/2003	1.4	1/3/2003	1.4	#####	#N/A	#####	#N/A
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1/7/2003	1.4	1/7/2003	1.4	#####	1.4	#####	1.4
1/8/2003	1.4	1/8/2003	1.4	#####	1.4	#####	1.4
1/9/2003	1.4	1/9/2003	1.4	#####	1.4	#####	1.4
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2/5/2003	1.3	2/5/2003	1.3	#####	1.3	#####	1.3
2/6/2003	1.4	2/6/2003	1.3	1/1/2003	#N/A	1/1/2003	#N/A
2/7/2003	1.4	2/7/2003	1.3	1/2/2003	1.3	1/2/2003	1.3
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#####	1.4	#####	1.3	1/6/2003	1.3	1/6/2003	1.3
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3/4/2003	1.3	3/4/2003	1.3	#####	1.3	#####	1.3
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3/6/2003	1.3	3/6/2003	1.3	#####	1.3	#####	1.3
3/7/2003	1.3	3/7/2003	1.3	#####	1.3	#####	1.3
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4/1/2003	1.3	4/1/2003	1.3	#####	1.3	#####	1.3
4/2/2003	1.3	4/2/2003	1.3	#####	1.3	#####	1.3
4/3/2003	1.3	4/3/2003	1.3	#####	1.3	#####	1.3
4/4/2003	1.3	4/4/2003	1.3	#####	1.3	#####	1.3
4/7/2003	1.3	4/7/2003	1.3	#####	1.3	#####	1.3
4/8/2003	1.3	4/8/2003	1.3	3/3/2003	1.3	3/3/2003	1.3
4/9/2003	1.3	4/9/2003	1.3	3/4/2003	1.3	3/4/2003	1.3
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#####	1.3	#####	1.3	#####	1.2	#####	1.2
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#####	1.3	#####	1.3	#####	1.2	#####	1.2
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7/8/2003	1.1	7/8/2003	1.1	#####	1.3	#####	1.2
7/9/2003	1.1	7/9/2003	1.1	#####	1.3	#####	1.2
#####	1.1	#####	1.1	#####	1.3	#####	1.2
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#####	1.1	#####	1.1	6/3/2003	1.3	6/3/2003	1.2
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8/1/2003	1.1	8/1/2003	1.1	#####	1.0	#####	0.9
8/4/2003	1.1	8/4/2003	1.1	#####	1.0	#####	0.9
8/5/2003	1.1	8/5/2003	1.1	#####	0.9	#####	0.9
8/6/2003	1.1	8/6/2003	1.1	#####	0.9	#####	0.9
8/7/2003	1.1	8/7/2003	1.1	#####	1.1	#####	1.0
8/8/2003	1.1	8/8/2003	1.1	#####	1.1	#####	1.0
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#####	1.1	#####	1.1	7/9/2003	1.1	7/9/2003	1.0
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9/1/2003	1.1	9/1/2003	1.1	#####	1.0	#####	1.0
9/2/2003	1.1	9/2/2003	1.1	#####	1.0	#####	1.1
9/3/2003	1.1	9/3/2003	1.1	#####	1.0	#####	1.0
9/4/2003	1.1	9/4/2003	1.1	#####	1.0	#####	1.0
9/5/2003	1.1	9/5/2003	1.1	#####	1.0	#####	1.0
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9/9/2003	1.1	9/9/2003	1.1	#####	1.0	#####	1.0
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2/2/2005	2.8	2/2/2005	2.6	#####	2.3	#####	2.4
2/3/2005	2.8	2/3/2005	2.6	#####	2.3	#####	2.4
2/4/2005	2.8	2/4/2005	2.6	#####	2.3	#####	2.4
2/7/2005	2.8	2/7/2005	2.6	#####	2.3	#####	2.4
2/8/2005	2.8	2/8/2005	2.6	#####	2.3	#####	2.4
2/9/2005	2.8	2/9/2005	2.6	#####	2.3	#####	2.4
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3/1/2005	2.9	3/1/2005	2.7	#####	2.3	#####	2.5
3/2/2005	2.9	3/2/2005	2.7	1/3/2005	2.3	1/3/2005	2.5
3/3/2005	3.0	3/3/2005	2.7	1/4/2005	2.3	1/4/2005	2.5
3/4/2005	3.0	3/4/2005	2.8	1/5/2005	2.3	1/5/2005	2.5
3/7/2005	3.0	3/7/2005	2.8	1/6/2005	2.4	1/6/2005	2.6

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4/5/2005	3.1	4/5/2005	2.9	2/2/2005	2.5	2/2/2005	2.7
4/6/2005	3.1	4/6/2005	2.9	2/3/2005	2.5	2/3/2005	2.7
4/7/2005	3.1	4/7/2005	2.9	2/4/2005	2.5	2/4/2005	2.7
4/8/2005	3.1	4/8/2005	2.9	2/7/2005	2.5	2/7/2005	2.7
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5/4/2005	3.2	5/4/2005	3.1	3/2/2005	2.7	3/2/2005	2.9
5/5/2005	3.2	5/5/2005	3.1	3/3/2005	2.7	3/3/2005	2.9
5/6/2005	3.2	5/6/2005	3.1	3/4/2005	2.7	3/4/2005	2.9
5/9/2005	3.3	5/9/2005	3.1	3/7/2005	2.7	3/7/2005	2.9
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8/2/2005	3.7	8/2/2005	3.5	#####	#N/A	#####	#N/A
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8/5/2005	3.8	8/5/2005	3.6	6/2/2005	3.1	6/2/2005	3.3
8/8/2005	3.8	8/8/2005	3.6	6/3/2005	3.1	6/3/2005	3.3
8/9/2005	3.8	8/9/2005	3.6	6/6/2005	3.1	6/6/2005	3.3
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#####	4.9	#####	4.7	8/2/2007	5.3	8/2/2007	5.4	
#####	4.9	#####	4.7	8/3/2007	5.3	8/3/2007	5.3	
#####	4.9	#####	4.7	8/6/2007	5.3	8/6/2007	5.4	
#####	4.9	#####	4.7	8/7/2007	5.3	8/7/2007	5.4	
#####	4.9	#####	4.7	8/8/2007	5.4	8/8/2007	5.4	
#####	4.9	#####	4.7	8/9/2007	5.5	8/9/2007	5.5	
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#####	4.9	#####	4.7	#####	5.6	#####	5.6	
#####	4.9	#####	4.7	#####	5.6	#####	5.5	
#####	4.9	#####	4.7	#####	5.5	#####	5.5	
#####	4.9	#####	4.7	#####	5.5	#####	5.5	
#####	4.9	#####	4.7	#####	5.5	#####	5.6	
#####	4.9	#####	4.7	#####	5.6	#####	5.5	
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#####	5.0	#####	4.8	#####	5.6	#####	5.5	
#####	5.0	#####	4.8	#####	5.6	#####	5.6	
#####	5.0	#####	4.8	#####	5.6	#####	5.6	
#####	5.0	#####	4.8	#####	5.6	#####	5.6	
#####	5.1	#####	4.8	#####	5.7	#####	5.7	
#####	5.1	#####	4.8	#####	5.8	#####	5.7	
#####	5.1	#####	4.8	#####	5.9	#####	5.8	
#####	5.1	#####	5.2	9/3/2007	#N/A	9/3/2007	#N/A	
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#####	5.1	#####	5.2	9/5/2007		5.9	9/5/2007	5.9
#####	5.2	#####	5.3	9/6/2007		5.9	9/6/2007	5.9
#####	5.2	#####	5.3	9/7/2007		5.9	9/7/2007	5.9
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#####	5.1	#####	5.2	#####		5.9	#####	5.8
#####	5.1	#####	5.2	#####		5.8	#####	5.8
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#####	5.0	#####	5.0	#####		5.2	#####	5.2
#####	4.9	#####	5.0	#####		5.2	#####	5.2
#####	4.9	#####	4.9	#####		5.2	#####	5.3

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#####	4.9	#####	4.9	#####	5.2	#####	5.3
#####	4.8	#####	4.9	#####	5.2	#####	5.2
#####	4.8	#####	4.8	#####	5.2	#####	5.3
#####	4.7	#####	4.6	#####	5.2	#####	5.3
#####	4.7	#####	4.6	#####	5.2	#####	5.3
1/2/2008	4.7	1/2/2008	4.6	#####	5.2	#####	5.3
1/3/2008	4.6	1/3/2008	4.5	#####	5.2	#####	5.3
1/4/2008	4.6	1/4/2008	4.5	#####	5.2	#####	5.3
1/7/2008	4.5	1/7/2008	4.4	#####	5.2	#####	5.3
1/8/2008	4.5	1/8/2008	4.4	#####	#N/A	#####	#N/A
1/9/2008	4.4	1/9/2008	4.4	#####	5.2	#####	5.3
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#####	4.3	#####	4.2	#####	5.2	#####	5.3
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#####	4.0	#####	4.0	#####	5.1	#####	5.2
#####	3.9	#####	4.0	#####	5.1	#####	5.3
#####	3.9	#####	3.9	#####	5.0	#####	5.2
#####	3.8	#####	3.9	#####	5.0	#####	5.2
#####	3.7	#####	3.8	#####	4.9	#####	5.1
#####	3.3	#####	3.4	#####	4.9	#####	5.1
#####	3.2	#####	3.3	#####	4.9	#####	5.1
#####	3.3	#####	3.3	#####	4.8	#####	5.0
#####	3.3	#####	3.3	#####	4.8	#####	5.0
#####	3.2	#####	3.3	#####	4.8	#####	5.0
#####	3.2	#####	3.3	#####	4.8	#####	4.9
#####	3.1	#####	3.1	#####	4.7	#####	4.9
2/1/2008	3.1	2/1/2008	3.1	#####	4.7	#####	4.8
2/4/2008	3.1	2/4/2008	3.2	#####	4.7	#####	4.8
2/5/2008	3.2	2/5/2008	3.2	#####	4.7	#####	4.8
2/6/2008	3.1	2/6/2008	3.2	#####	4.7	#####	4.9
2/7/2008	3.1	2/7/2008	3.2	#####	4.7	#####	4.9
2/8/2008	3.1	2/8/2008	3.2	#####	4.7	#####	4.9
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#####	3.1	#####	3.1	#####	4.7	#####	4.9
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#####	3.1	#####	3.1	#####	4.8	#####	5.1
#####	3.1	#####	3.1	#####	4.9	#####	5.1
#####	3.1	#####	3.1	#####	4.9	#####	5.1
#####	3.1	#####	3.1	#####	#N/A	#####	#N/A
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#####	3.1	#####	3.1	#####	4.9	#####	5.2

#####	3.1	#####	3.1	#####	4.9	#####	5.2
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#####	3.1	#####	3.1	#####	5.6	#####	5.3
3/3/2008	3.0	3/3/2008	3.1	#####	5.5	#####	5.3
3/4/2008	3.0	3/4/2008	3.1	#####	5.6	#####	5.3
3/5/2008	3.0	3/5/2008	3.1	#####	5.5	#####	5.3
3/6/2008	3.0	3/6/2008	3.1	#####	5.5	#####	5.3
3/7/2008	2.9	3/7/2008	3.0	#####	5.5	#####	5.3
#####	2.9	#####	2.9	#####	5.5	#####	5.3
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#####	2.9	#####	2.9	#####	5.4	#####	5.3
#####	2.8	#####	2.8	#####	5.3	#####	5.2
#####	2.8	#####	2.8	#####	5.2	#####	5.2
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#####	2.5	#####	2.5	#####	5.3	#####	5.3
#####	2.6	#####	2.6	#####	5.2	#####	5.2
#####	2.6	#####	2.6	#####	5.2	#####	5.2
#####	2.7	#####	2.7	#####	5.2	#####	5.2
#####	2.7	#####	2.7	#####	5.1	#####	5.1
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4/1/2008	2.7	4/1/2008	2.7	#####	5.1	#####	5.1
4/2/2008	2.7	4/2/2008	2.7	#####	4.7	#####	4.9
4/3/2008	2.7	4/3/2008	2.7	#####	4.7	#####	4.9
4/4/2008	2.7	4/4/2008	2.7	1/1/2008	#N/A	1/1/2008	#N/A
4/7/2008	2.7	4/7/2008	2.7	1/2/2008	4.7	1/2/2008	4.7
4/8/2008	2.7	4/8/2008	2.7	1/3/2008	4.6	1/3/2008	4.8
4/9/2008	2.7	4/9/2008	2.7	1/4/2008	4.6	1/4/2008	4.8
#####	2.7	#####	2.7	1/7/2008	4.5	1/7/2008	4.6
#####	2.7	#####	2.7	1/8/2008	4.5	1/8/2008	4.6
#####	2.7	#####	2.7	1/9/2008	4.4	1/9/2008	4.4
#####	2.7	#####	2.7	#####	4.4	#####	4.4
#####	2.7	#####	2.7	#####	4.3	#####	4.3
#####	2.8	#####	2.8	#####	4.1	#####	4.1
#####	2.9	#####	2.9	#####	4.1	#####	4.1
#####	2.9	#####	2.9	#####	4.0	#####	3.9
#####	2.9	#####	2.9	#####	4.0	#####	4.0
#####	2.9	#####	2.9	#####	4.0	#####	3.9
#####	2.9	#####	2.9	#####	#N/A	#####	#N/A
#####	2.9	#####	2.9	#####	3.8	#####	3.7
#####	2.9	#####	2.9	#####	3.3	#####	3.3
#####	2.9	#####	2.8	#####	3.3	#####	3.3
#####	2.9	#####	2.8	#####	3.3	#####	3.3
5/1/2008	2.8	5/1/2008	2.7	#####	3.3	#####	3.3
5/2/2008	2.8	5/2/2008	2.7	#####	3.3	#####	3.3
5/6/2008	2.8	5/6/2008	2.7	#####	3.3	#####	3.3

5/7/2008	2.7	5/7/2008	2.6	#####	3.2	#####	3.2
5/8/2008	2.7	5/8/2008	2.6	2/1/2008	3.2	2/1/2008	3.2
5/9/2008	2.7	5/9/2008	2.6	2/4/2008	3.3	2/4/2008	3.2
#####	2.7	#####	2.5	2/5/2008	3.3	2/5/2008	3.3
#####	2.7	#####	2.5	2/6/2008	3.3	2/6/2008	3.2
#####	2.7	#####	2.5	2/7/2008	3.2	2/7/2008	3.1
#####	2.7	#####	2.5	2/8/2008	3.2	2/8/2008	3.1
#####	2.7	#####	2.5	#####	3.1	#####	3.1
#####	2.7	#####	2.5	#####	3.1	#####	3.1
#####	2.7	#####	2.4	#####	3.1	#####	3.1
#####	2.6	#####	2.4	#####	3.2	#####	3.1
#####	2.6	#####	2.4	#####	3.2	#####	3.1
#####	2.6	#####	2.4	#####	#N/A	#####	#N/A
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#####	2.6	#####	2.4	#####	3.2	#####	3.1
#####	2.7	#####	2.5	#####	3.2	#####	3.2
#####	2.7	#####	2.5	#####	3.2	#####	3.1
6/2/2008	2.7	6/2/2008	2.5	#####	3.2	#####	3.1
6/3/2008	2.7	6/3/2008	2.5	#####	3.2	#####	3.1
6/4/2008	2.7	6/4/2008	2.5	#####	3.2	#####	3.1
6/5/2008	2.7	6/5/2008	2.4	#####	3.2	#####	3.1
6/6/2008	2.7	6/6/2008	2.4	#####	3.2	#####	3.1
6/9/2008	2.7	6/9/2008	2.4	3/3/2008	3.1	3/3/2008	3.1
#####	2.8	#####	2.5	3/4/2008	3.1	3/4/2008	3.1
#####	2.8	#####	2.5	3/5/2008	3.1	3/5/2008	3.1
#####	2.8	#####	2.5	3/6/2008	3.1	3/6/2008	3.0
#####	2.8	#####	2.5	3/7/2008	3.0	3/7/2008	3.0
#####	2.8	#####	2.5	#####	3.0	#####	2.9
#####	2.8	#####	2.5	#####	2.9	#####	2.9
#####	2.8	#####	2.5	#####	2.9	#####	2.9
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#####	2.8	#####	2.5	#####	2.7	#####	2.8
#####	2.8	#####	2.5	#####	2.6	#####	2.6
#####	2.8	#####	2.5	#####	2.6	#####	2.7
#####	2.8	#####	2.5	#####	2.7	#####	2.7
#####	2.8	#####	2.5	#####	2.7	#####	2.7
#####	2.8	#####	2.5	#####	#N/A	#####	#N/A
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7/1/2008	2.8	7/1/2008	2.5	#####	2.8	#####	2.8
7/2/2008	2.8	7/2/2008	2.5	#####	2.8	#####	2.8
7/3/2008	2.8	7/3/2008	2.5	#####	2.9	#####	2.9
7/4/2008	2.8	7/4/2008	2.5	#####	2.9	#####	3.0
7/7/2008	2.8	7/7/2008	2.5	#####	3.0	#####	3.0
7/8/2008	2.8	7/8/2008	2.5	4/1/2008	3.0	4/1/2008	3.0
7/9/2008	2.8	7/9/2008	2.5	4/2/2008	3.0	4/2/2008	3.0
#####	2.8	#####	2.5	4/3/2008	3.0	4/3/2008	3.0
#####	2.8	#####	2.5	4/4/2008	3.0	4/4/2008	3.0

#####	2.8	#####	2.5	4/7/2008	3.0	4/7/2008	3.0
#####	2.8	#####	2.5	4/8/2008	3.0	4/8/2008	3.0
#####	2.8	#####	2.5	4/9/2008	3.0	4/9/2008	3.0
#####	2.8	#####	2.5	#####	3.0	#####	3.0
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#####	2.8	#####	2.5	#####	2.9	#####	2.9
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#####	2.8	#####	2.5	#####	3.0	#####	3.1
#####	2.8	#####	2.5	#####	3.0	#####	3.1
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8/1/2008	2.8	8/1/2008	2.5	#####	3.0	#####	3.1
8/4/2008	2.8	8/4/2008	2.5	#####	3.0	#####	3.2
8/5/2008	2.8	8/5/2008	2.5	#####	2.9	#####	3.2
8/6/2008	2.8	8/6/2008	2.5	#####	2.9	#####	3.2
8/7/2008	2.8	8/7/2008	2.5	5/1/2008	2.9	5/1/2008	3.0
8/8/2008	2.8	8/8/2008	2.5	5/2/2008	2.9	5/2/2008	2.9
#####	2.8	#####	2.5	5/5/2008	2.9	5/5/2008	2.9
#####	2.8	#####	2.5	5/6/2008	2.9	5/6/2008	2.9
#####	2.8	#####	2.5	5/7/2008	2.8	5/7/2008	2.9
#####	2.8	#####	2.5	5/8/2008	2.8	5/8/2008	2.9
#####	2.8	#####	2.5	5/9/2008	2.7	5/9/2008	2.8
#####	2.8	#####	2.5	#####	2.6	#####	2.9
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#####	2.8	#####	2.5	#####	2.6	#####	2.9
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9/1/2008	2.8	9/1/2008	2.5	#####	2.5	#####	2.8
9/2/2008	2.8	9/2/2008	2.5	#####	#N/A	#####	#N/A
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9/4/2008	2.8	9/4/2008	2.5	#####	2.5	#####	2.8
9/5/2008	2.8	9/5/2008	2.5	#####	2.6	#####	2.9
9/8/2008	2.8	9/8/2008	2.5	#####	2.6	#####	2.9
9/9/2008	2.8	9/9/2008	2.5	6/2/2008	2.6	6/2/2008	2.9
#####	2.8	#####	2.5	6/3/2008	2.6	6/3/2008	2.9
#####	2.8	#####	2.5	6/4/2008	2.6	6/4/2008	2.9
#####	2.8	#####	2.5	6/5/2008	2.6	6/5/2008	2.9
#####	2.8	#####	2.5	6/6/2008	2.7	6/6/2008	2.9
#####	2.9	#####	2.7	6/9/2008	2.7	6/9/2008	2.9
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#####	3.5	#####	3.4	#####	2.7	#####	3.1
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#####	4.2	#####	4.0	#####	2.7	#####	3.0
#####	4.2	#####	4.0	#####	2.7	#####	3.0
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#####	4.3	#####	4.1	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.6	#####	3.0
#####	4.5	#####	4.3	7/1/2008	2.7	7/1/2008	3.0
#####	4.8	#####	4.5	7/2/2008	2.7	7/2/2008	3.0
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#####	4.8	#####	4.6	7/4/2008	#N/A	7/4/2008	#N/A
#####	4.6	#####	4.5	7/7/2008	2.7	7/7/2008	3.0
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#####	4.5	#####	4.3	7/9/2008	2.7	7/9/2008	3.0
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#####	3.5	#####	3.3	#####	2.7	#####	3.0
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#####	3.5	#####	3.2	#####	2.6	#####	3.0
#####	3.5	#####	3.2	#####	2.7	#####	3.0
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#####	2.3	#####	1.6	#####	2.7	#####	3.0
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#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.7	#####	3.0
#####	2.2	#####	1.8	#####	2.7	#####	3.0
#####	2.2	#####	1.6	9/1/2008	#N/A	9/1/2008	#N/A
#####	2.1	#####	1.4	9/2/2008	2.6	9/2/2008	3.0
#####	2.0	#####	1.2	9/3/2008	2.6	9/3/2008	3.0
#####	1.9	#####	1.0	9/4/2008	2.6	9/4/2008	3.0
#####	1.9	#####	1.0	9/5/2008	2.6	9/5/2008	3.0
#####	1.8	#####	0.9	9/8/2008	2.7	9/8/2008	3.0
#####	1.6	#####	0.6	9/9/2008	2.7	9/9/2008	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	3.2	#####	3.2
#####	1.5	#####	0.5	#####	3.8	#####	3.8
#####	1.4	#####	0.4	#####	6.0	#####	5.0
#####	1.4	#####	0.4	#####	6.0	#####	5.0
1/2/2009	1.4	1/2/2009	0.4	#####	5.0	#####	5.0
1/5/2009	1.4	1/5/2009	0.4	#####	5.3	#####	5.0
1/6/2009	1.4	1/6/2009	0.4	#####	5.3	#####	5.0
1/7/2009	1.4	1/7/2009	0.4	#####	5.5	#####	5.0
1/8/2009	1.4	1/8/2009	0.4	#####	5.5	#####	5.0
1/9/2009	1.3	1/9/2009	0.4	#####	5.5	#####	5.0
#####	1.2	#####	0.3	#####	7.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.5	#####	6.0
#####	1.1	#####	0.4	#####	7.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	#N/A	#####	#N/A
#####	1.2	#####	0.4	#####	5.8	#####	6.0
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.0	#####	5.8
#####	1.2	#####	0.4	#####	4.3	#####	5.0

2/2/2009	1.2	2/2/2009	0.4	#####	4.0	#####	4.5
2/3/2009	1.2	2/3/2009	0.4	#####	3.8	#####	4.5
2/4/2009	1.2	2/4/2009	0.4	#####	3.8	#####	4.5
2/5/2009	1.2	2/5/2009	0.4	#####	3.8	#####	4.5
2/6/2009	1.2	2/6/2009	0.4	#####	3.8	#####	4.5
2/9/2009	1.2	2/9/2009	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	2.8	#####	4.3
#####	1.2	#####	0.5	#####	2.5	#####	4.0
#####	1.2	#####	0.5	#####	2.3	#####	3.3
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	#N/A	#####	#N/A
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	1.8	#####	3.0
3/2/2009	1.3	3/2/2009	0.5	#####	1.8	#####	3.0
3/3/2009	1.3	3/3/2009	0.5	#####	1.8	#####	3.0
3/4/2009	1.3	3/4/2009	0.5	#####	1.8	#####	3.0
3/5/2009	1.3	3/5/2009	0.5	#####	1.9	#####	3.0
3/6/2009	1.3	3/6/2009	0.5	#####	2.0	#####	3.0
3/9/2009	1.3	3/9/2009	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	#N/A	#####	#N/A
#####	1.3	#####	0.6	#####	2.8	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.5	#####	2.6	#####	3.0
#####	1.2	#####	0.5	#####	2.7	#####	3.0
#####	1.2	#####	0.5	#####	2.3	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	2.9
#####	1.2	#####	0.5	#####	1.5	#####	2.6
#####	1.2	#####	0.5	#####	1.3	#####	2.2
#####	1.2	#####	0.5	#####	1.3	#####	2.0
4/1/2009	1.2	4/1/2009	0.5	#####	1.3	#####	2.0
4/2/2009	1.2	4/2/2009	0.5	#####	1.3	#####	2.0
4/3/2009	1.2	4/3/2009	0.5	#####	1.3	#####	2.0
4/6/2009	1.2	4/6/2009	0.5	#####	1.2	#####	2.0
4/7/2009	1.1	4/7/2009	0.5	#####	1.2	#####	2.0



#####	0.6	#####	0.3	3/2/2009	0.8	3/2/2009	1.7
#####	0.6	#####	0.3	3/3/2009	0.9	3/3/2009	1.7
#####	0.6	#####	0.3	3/4/2009	0.8	3/4/2009	1.7
#####	0.6	#####	0.3	3/5/2009	0.8	3/5/2009	1.7
#####	0.6	#####	0.3	3/6/2009	0.8	3/6/2009	1.7
#####	0.6	#####	0.3	3/9/2009	0.9	3/9/2009	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
7/1/2009	0.6	7/1/2009	0.3	#####	1.0	#####	1.7
7/2/2009	0.6	7/2/2009	0.3	#####	1.0	#####	1.7
7/3/2009	0.6	7/3/2009	0.3	#####	1.0	#####	1.7
7/6/2009	0.5	7/6/2009	0.3	#####	1.0	#####	1.7
7/7/2009	0.5	7/7/2009	0.3	#####	1.0	#####	1.6
7/8/2009	0.5	7/8/2009	0.3	#####	1.0	#####	1.6
7/9/2009	0.5	7/9/2009	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.6	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	4/1/2009	1.0	4/1/2009	1.6
#####	0.5	#####	0.3	4/2/2009	1.0	4/2/2009	1.6
#####	0.5	#####	0.3	4/3/2009	1.0	4/3/2009	1.6
#####	0.5	#####	0.3	4/6/2009	1.0	4/6/2009	1.6
#####	0.5	#####	0.3	4/7/2009	1.0	4/7/2009	1.6
#####	0.5	#####	0.3	4/8/2009	1.0	4/8/2009	1.6
#####	0.5	#####	0.3	4/9/2009	0.8	4/9/2009	1.5
#####	0.5	#####	0.3	#####	#N/A	#####	#N/A
#####	0.5	#####	0.3	#####	0.8	#####	1.5
#####	0.5	#####	0.3	#####	1.0	#####	1.5
8/3/2009	0.5	8/3/2009	0.3	#####	1.0	#####	1.5
8/4/2009	0.5	8/4/2009	0.3	#####	1.0	#####	1.5
8/5/2009	0.5	8/5/2009	0.3	#####	1.0	#####	1.5
8/6/2009	0.5	8/6/2009	0.3	#####	1.0	#####	1.5
8/7/2009	0.5	8/7/2009	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	5/1/2009	0.9	5/1/2009	1.4
#####	0.4	#####	0.3	5/4/2009	0.9	5/4/2009	1.4
#####	0.4	#####	0.3	5/5/2009	0.8	5/5/2009	1.4





















7/6/2011	0.2	7/6/2011	0.2	#####	0.3	#####	0.4
7/7/2011	0.2	7/7/2011	0.2	#####	0.3	#####	0.4
7/8/2011	0.2	7/8/2011	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	3/1/2011	0.3	3/1/2011	0.4
#####	0.2	#####	0.2	3/2/2011	0.3	3/2/2011	0.4
#####	0.2	#####	0.2	3/3/2011	0.3	3/3/2011	0.4
#####	0.2	#####	0.2	3/4/2011	0.3	3/4/2011	0.4
#####	0.3	#####	0.2	3/7/2011	0.3	3/7/2011	0.4
#####	0.3	#####	0.2	3/8/2011	0.3	3/8/2011	0.4
#####	0.3	#####	0.2	3/9/2011	0.3	3/9/2011	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
8/1/2011	0.3	8/1/2011	0.2	#####	0.3	#####	0.4
8/2/2011	0.3	8/2/2011	0.2	#####	0.3	#####	0.4
8/3/2011	0.3	8/3/2011	0.2	#####	0.3	#####	0.4
8/4/2011	0.3	8/4/2011	0.2	#####	0.3	#####	0.4
8/5/2011	0.3	8/5/2011	0.2	#####	0.3	#####	0.4
8/8/2011	0.3	8/8/2011	0.2	#####	0.3	#####	0.4
8/9/2011	0.3	8/9/2011	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	4/1/2011	0.3	4/1/2011	0.4
#####	0.3	#####	0.2	4/4/2011	0.3	4/4/2011	0.4
#####	0.3	#####	0.2	4/5/2011	0.3	4/5/2011	0.4
#####	0.3	#####	0.2	4/6/2011	0.3	4/6/2011	0.4
#####	0.3	#####	0.2	4/7/2011	0.3	4/7/2011	0.4
#####	0.3	#####	0.2	4/8/2011	0.3	4/8/2011	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
9/1/2011	0.3	9/1/2011	0.2	#####	0.3	#####	0.4
9/2/2011	0.3	9/2/2011	0.2	#####	0.3	#####	0.4
9/5/2011	0.3	9/5/2011	0.2	#####	0.3	#####	0.4
9/6/2011	0.3	9/6/2011	0.2	#####	0.3	#####	0.4
9/7/2011	0.3	9/7/2011	0.2	#####	0.3	#####	0.4
9/8/2011	0.3	9/8/2011	0.2	#####	0.3	#####	0.4
9/9/2011	0.3	9/9/2011	0.2	#####	0.3	#####	0.4

















I-26

[London](#)

Reserve System

Underwriter	Security purchased by the Enterprise	LIBOR-Based Interest Rate	CUSIP	Risk Factors language: Underwriters may rip you off by fucking with your reference index	Reviewer
Bank of America	BAFC 2007	1mL + 16	05952DAA1	FALSE	Timothy Lee
Barclays Capital	FHLT 2005	1mL + 26	35729PMA	FALSE	Timothy Lee
		Tied to mortgage rates, which are keyed inter alia to 6m and 12m			
Citibank	CMLTI 200	LIBOR	17312YAB8	FALSE	Timothy Lee
Deutsche Bank	DBALT 200	1mL + 19	25151XAE1	FALSE	Timothy Lee
JPMorgan	JPMAC 200	1mL + 13	46630BAA4	FALSE	Timothy Lee
RBS	OOMLT 200	1mL + 14	68402YAA4	FALSE	Timothy Lee
UBS	MABS 200	1mL + 25	57643LJR8	FALSE	Timothy Lee
HSBC	FFML 2006	1mL + 13	32028PAA3	FALSE	Timothy Lee

## Risk Factors

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**Item ID:** 31992  
**From:** Timothy Lee <timoth31@gmail.com>  
**To:** Timothy Lee <timothy.lee@fhfaoig.gov>  
**Subject:** Risk Factors  
**Sent:** October 7, 2012 5:18 AM  
**Received:** October 7, 2012 5:18 AM

LIBOR May Be Manipulated By The Underwriters Along with other major financial institutions, the Lead Manager and some Co-Managers share in determining the LIBOR index used to calculate interest payments on the Certificates. To contribute interest rates used to determine LIBOR, the Lead Manager and such Co-Managers may, at times, employ in their money markets departments the sort of lying troglodytes who care as much about ethical behavior as Paul Prudhomme cares about dieting. Moreover, such employees may be in regular contact with their counterparts in the mortgage-backed securities departments and senior management. Such employees may, if they find it convenient, strive to reduce the published LIBOR figure in order to improve their own trading positions or to stem widespread panic about their bank's financial soundness. As a result, holders of the Certificates may suffer reduced returns on their investments.

-- ----- Timothy Lee 646-359-3710 timoth31@gmail.com

## **LIBOR action memorandum draft for Steve.docx**

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**Item ID:** 31993  
**From:** Phillips, Wesley (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Parker, Richard (b) (5), Wu, Simon (b) (6)  
**Subject:** LIBOR action memorandum draft for Steve.docx  
**Sent:** October 9, 2012 9:48 AM  
**Received:** October 9, 2012 9:48 AM

Tim: Here are my comments as discussed. See pp. 4 and 5. Wes

**Attachment #1**

**LIBOR action memorandum draft for Steve.docx**

**Original view**

8 pages (displayed on pages 3 to 10)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

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(b) (5)

In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR,<sup>1</sup> a market-standard index used to calculate payments on over \$300 trillion of financial instruments and described as “the most important figure in finance,”<sup>2</sup> to its own advantage. According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>3</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>4</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.

Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.”<sup>5</sup>

## Background

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>6</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises' ability to remain viable entities through Senior Preferred Share Purchase Agreements ("PSPAs") with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>7</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>8</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets, on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders' market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- **Floating rate bonds.** Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship, and still holds \$132 billion in such instruments as of June 30, 2012.<sup>9</sup>
- **Interest rate swaps.** Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>a</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in

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<sup>a</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of a specified index. LIBOR is the principal index used for US dollar investments, including floating rate bonds and interest rate derivatives.<sup>10</sup> It is determined by daily polls of 16 leading financial institutions, which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining eight submissions.<sup>11</sup>

### FHFA-OIG Analysis

(b) (5)

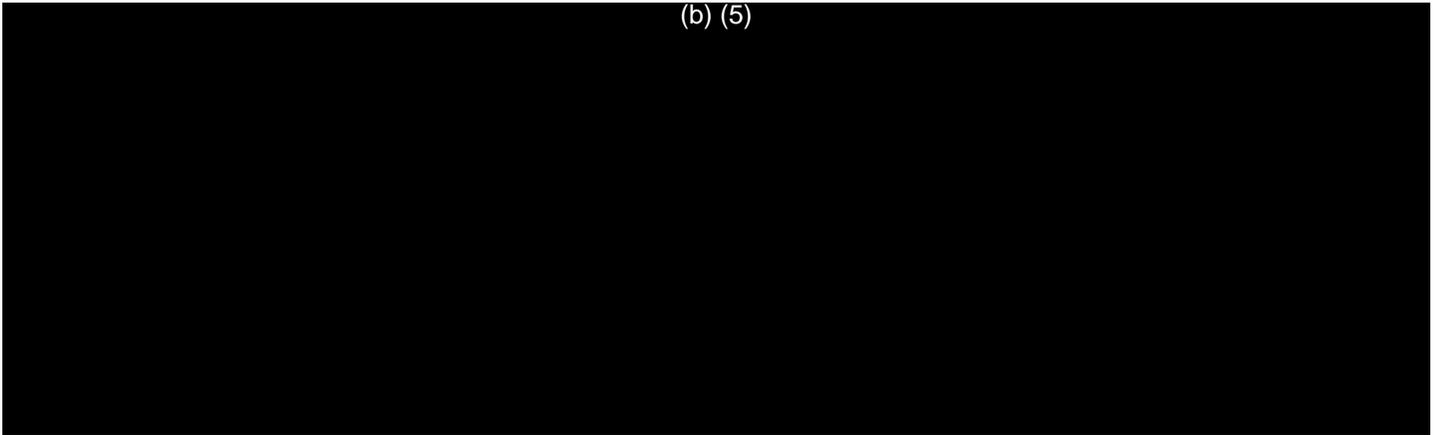
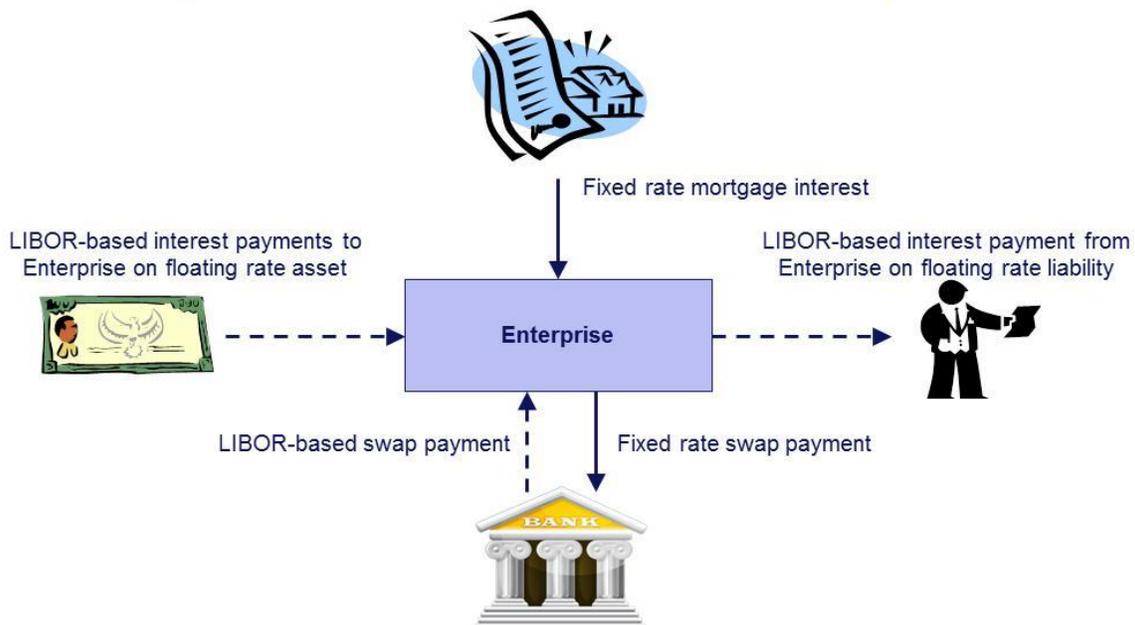


Figure 1. LIBOR-Based Payments to and From the Enterprises



(b) (5)

(b) (5)

(b) (5)

(b) (5)

- 
- <sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012
- <sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>5</sup> University of Pennsylvania, "[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)," July 18, 2012
- <sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)," September 7, 2008, p.6.
- <sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)," January 20, 2010
- <sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddie.mac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddie.mac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)," July 4, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2
- <sup>19</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010. Excludes self-led transactions.
- <sup>20</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## **FW: LIBOR action memorandum draft for Steve.docx**

**Item ID:** 31995  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Phillips, Wesley </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1881bcb698c45b096269b8112f87787-Wesley Phil>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>  
**Subject:** FW: LIBOR action memorandum draft for Steve.docx  
**Sent:** October 9, 2012 10:08 AM  
**Received:** October 9, 2012 10:08 AM

Hi Old Salt, Wes walked me through his comments, which can be summarized as follows: (b) (5)

Frankly, I am happy to go either way on this one. I plan to go ahead and swap out graphics and stats to stop them through 2Q10. Let me know if we need to discuss. Tim  
From: Phillips, Wesley Sent: Tuesday, October 09, 2012 9:48 AM To: Lee, Timothy Cc: Parker, Richard; Wu, Simon  
Subject: LIBOR action memorandum draft for Steve.docx Tim: Here are my comments as discussed. See pp. 4 and 5.  
Wes

**Attachment #1**

**LIBOR action memorandum draft for Steve.docx**

**Original view**

8 pages (displayed on pages 3 to 10)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

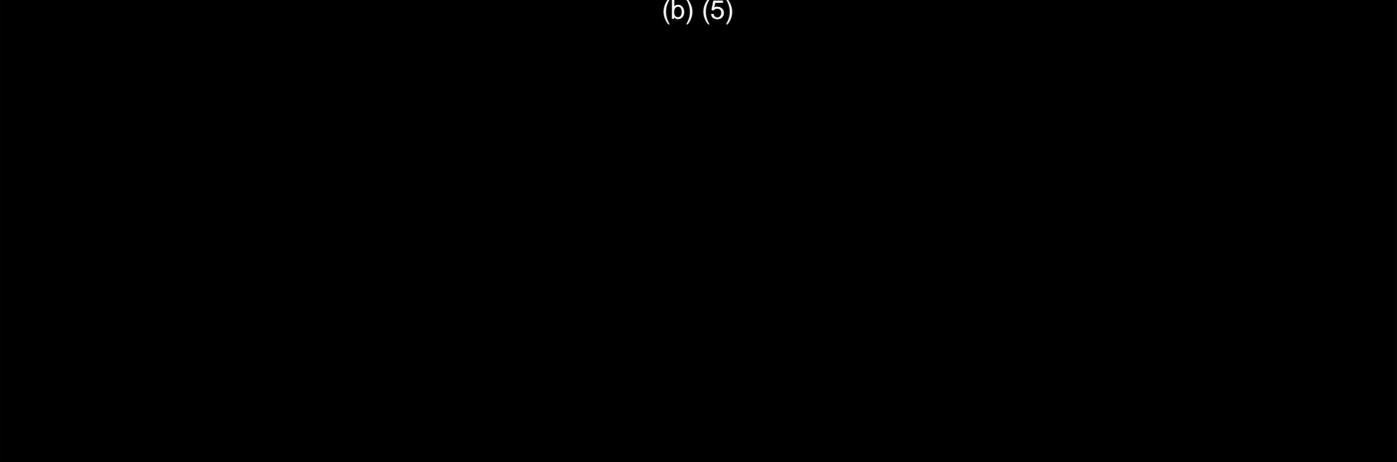
---

400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

---

(b) (5)



In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR,<sup>1</sup> a market-standard index used to calculate payments on over \$300 trillion of financial instruments and described as “the most important figure in finance,”<sup>2</sup> to its own advantage. According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>3</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>4</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.

Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.”<sup>5</sup>

## Background

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>6</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises' ability to remain viable entities through Senior Preferred Share Purchase Agreements ("PSPAs") with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>7</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>8</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets, on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders' market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- **Floating rate bonds.** Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship, and still holds \$132 billion in such instruments as of June 30, 2012.<sup>9</sup>
- **Interest rate swaps.** Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>a</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in

---

<sup>a</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

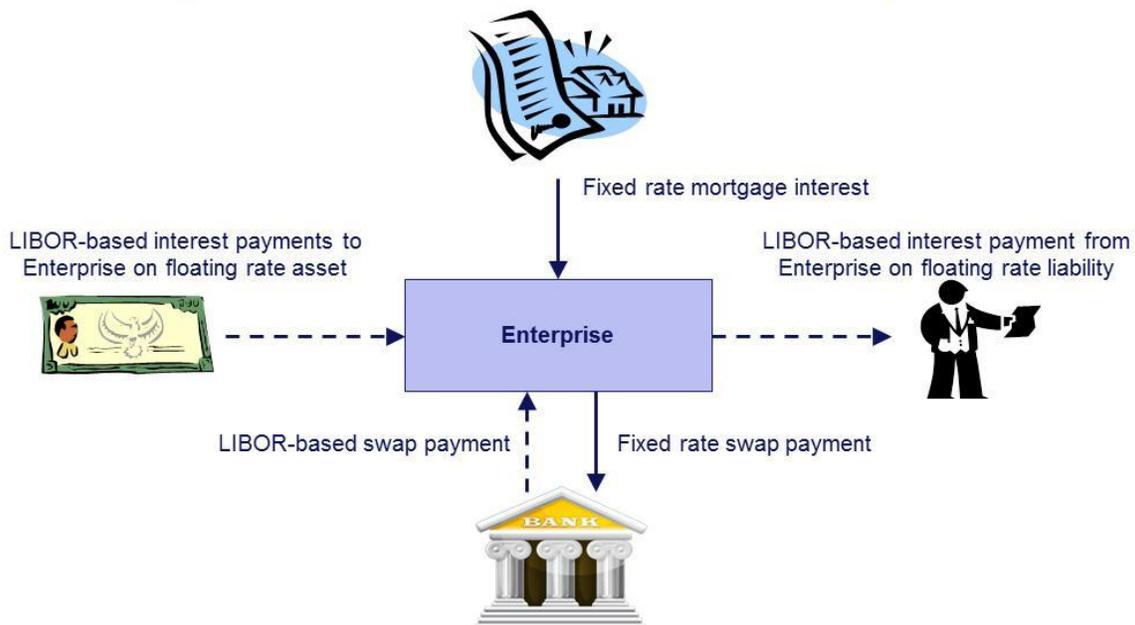
stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of a specified index. LIBOR is the principal index used for US dollar investments, including floating rate bonds and interest rate derivatives.<sup>10</sup> It is determined by daily polls of 16 leading financial institutions, which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining eight submissions.<sup>11</sup>

### FHFA-OIG Analysis

(b) (5)

Figure 1. LIBOR-Based Payments to and From the Enterprises



(b) (5)

(b) (5)

(b) (5)

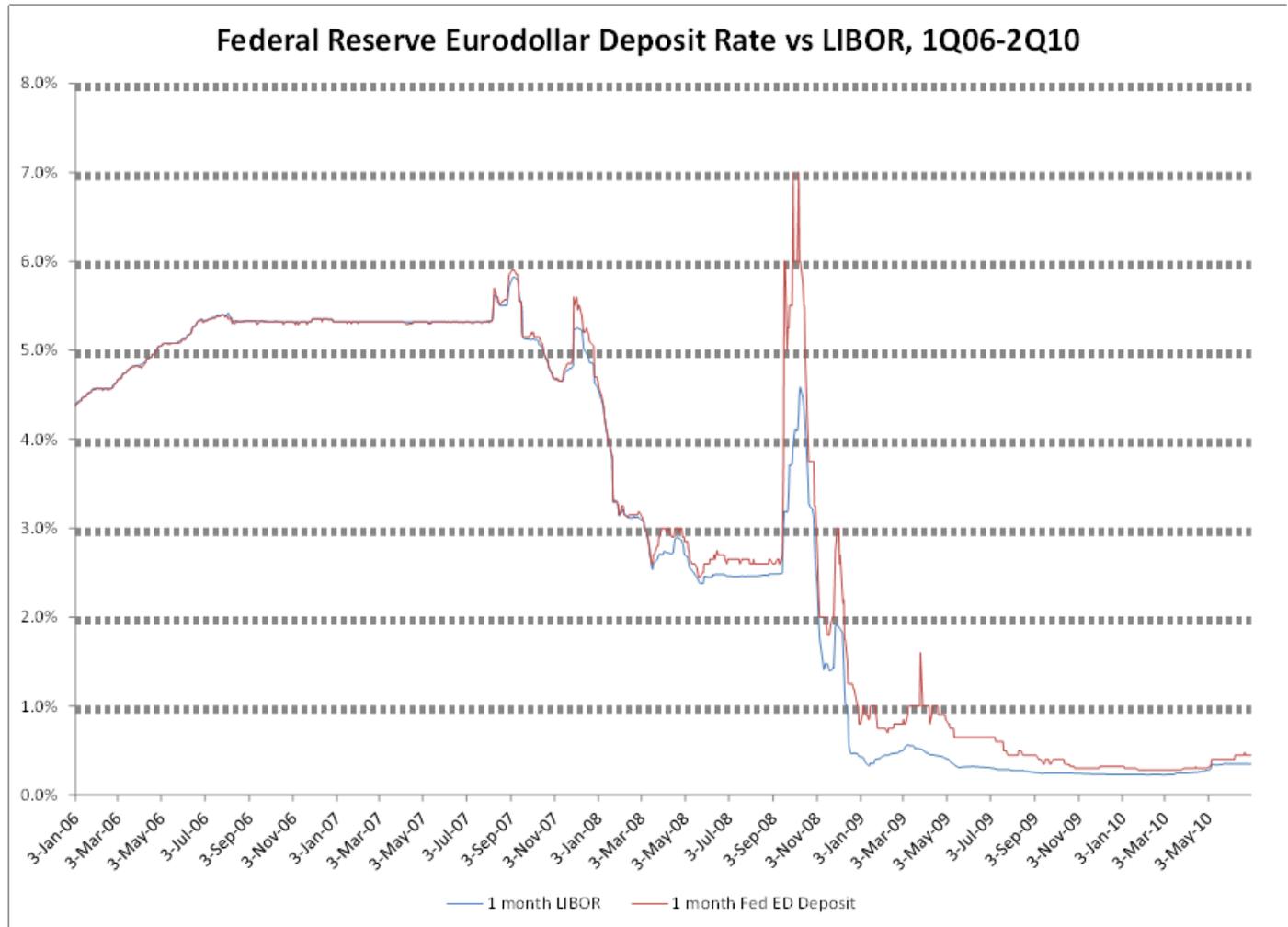
(b) (5)

- 
- <sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012
- <sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>5</sup> University of Pennsylvania, "[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)", July 18, 2012
- <sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddie.mac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddie.mac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2
- <sup>19</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010. Excludes self-led transactions.
- <sup>20</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

Attachment #2

image003.png

Image



**RE: LIBOR action memorandum draft for Steve.docx**

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**Item ID:** 31998  
**From:** Wu, Simon (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
**Cc:** Phillips, Wesley (b) (6), Bloch, David (b) (6)  
**Subject:** RE: LIBOR action memorandum draft for Steve.docx  
**Sent:** October 9, 2012 10:14 AM  
**Received:** October 9, 2012 10:14 AM

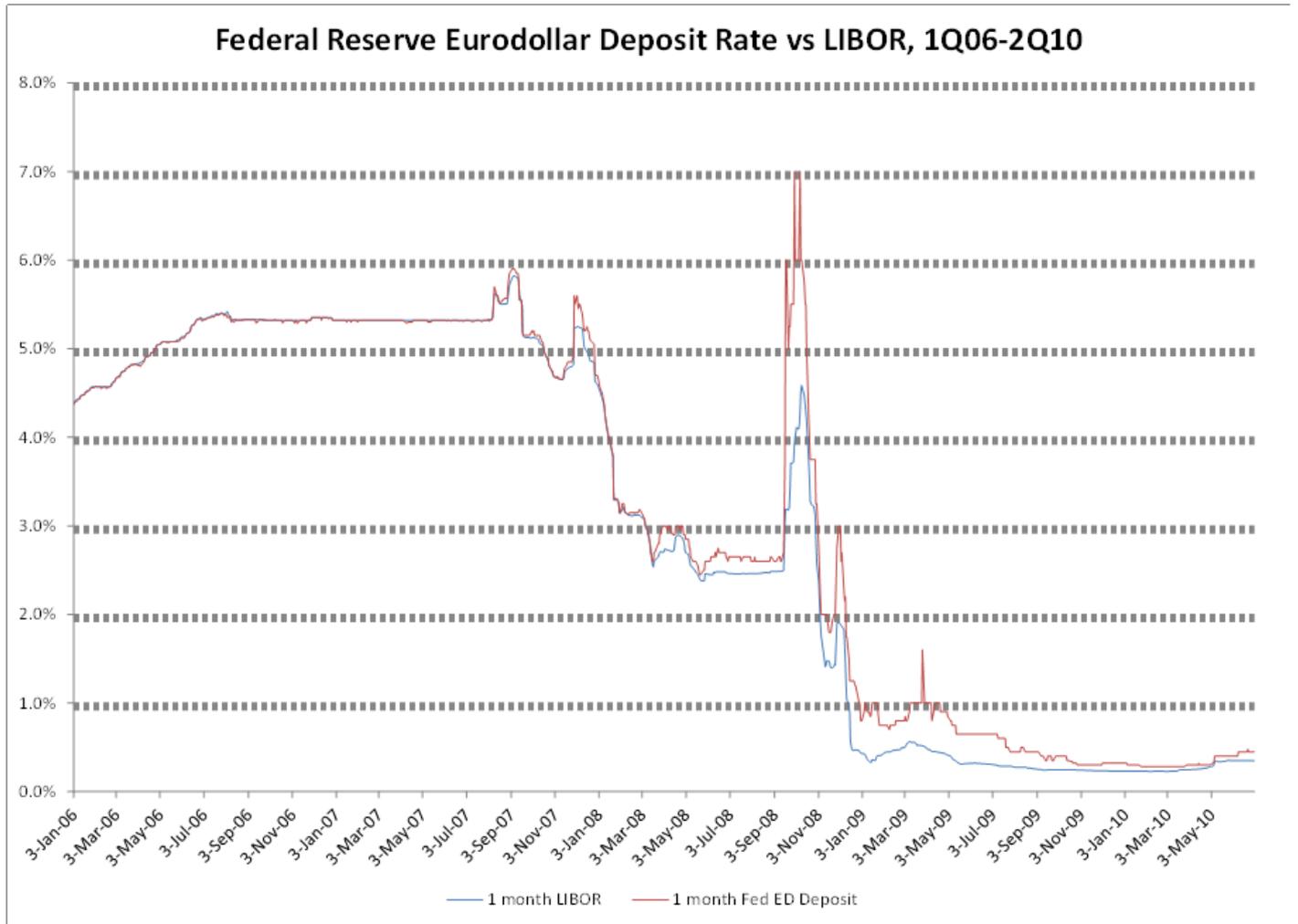
(b) (5)

. From: Lee, Timothy Sent: Tuesday, October 09, 2012 10:09 AM To: Parker, Richard Cc: Phillips, Wesley; Bloch, David; Wu, Simon Subject: FW: LIBOR action memorandum draft for Steve.docx Hi Old Salt, Wes walked me through his comments, which can be summarized as follows: - (b) (5)

[Redacted]

Frankly, I am happy to go either way on this one (b) (5)  
Tim From: Phillips, Wesley Sent: Tuesday, October 09, 2012 9:48 AM To: Lee, Timothy Cc: Parker, Richard; Wu, Simon Subject: LIBOR action memorandum draft for Steve.docx Tim: Here are my comments as discussed. See pp. 4 and 5. Wes

Attachment #1  
image001.png  
Image



## LIBOR memo

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**Item ID:** 32000  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>  
**Cc:** Phillips, Wesley </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1881bcb698c45b096269b8112f87787-Wesley Phil>, Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** LIBOR memo  
**Sent:** October 9, 2012 11:17 AM  
**Received:** October 9, 2012 11:17 AM

Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **FW: LIBOR memo**

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**Item ID:** 32001  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Rhinesmith, Alan </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=98d654fcd31f48f7887a69bf4cc5b12d-Alan Rhines>  
**Subject:** FW: LIBOR memo  
**Sent:** October 9, 2012 11:17 AM  
**Received:** October 9, 2012 11:17 AM

From: Lee, Timothy Sent: Tuesday, October 09, 2012 11:17 AM To: Grob, George Cc: Phillips, Wesley; Parker, Richard; Wu, Simon; Bloch, David Subject: LIBOR memo Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

---

**Item ID:** 32002  
**From:** Phillips, Wesley (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Grob, George (b) (6)  
**Cc:** Parker, Richard (b) (6), Wu, Simon (b) (6)  
Bloch, David (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 11:26 AM  
**Received:** October 9, 2012 11:26 AM

I think that works well. (b) (5)

. Wes From: Lee, Timothy Sent: Tuesday, October 09, 2012 11:17 AM To: Grob, George Cc: Phillips, Wesley; Parker, Richard; Wu, Simon; Bloch, David Subject: LIBOR memo Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

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**Item ID:** 32003  
**From:** Wu, Simon (b) (6)  
**To:** Phillips, Wesley (b) (6), Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Grob, George (b) (6)  
**Cc:** Parker, Richard (b) (6), Bloch, David (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 11:32 AM  
**Received:** October 9, 2012 11:32 AM

Let me revise the new chart one more time... Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024 Voice: (b) (6) Confidentiality Notice: The information contained in this e-mail and any attachments may be confidential or privileged under applicable law, or otherwise may be protected from disclosure to anyone other than the intended recipient(s). Any use, distribution, or copying of this e-mail, including any of its contents or attachments by any person other than the intended recipient, or for any purpose other than its intended use, is strictly prohibited. If you believe you have received this e-mail in error: permanently delete the e-mail and any attachments, and do not save, copy, disclose, or rely on any part of the information contained in this e-mail or its attachments. Please call the OIG at 202-730-4949 if you have any questions or are not an intended recipient of this email. From: Phillips, Wesley Sent: Tuesday, October 09, 2012 11:27 AM To: Lee, Timothy; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I think that works well. (b) (5)

. Wes From: Lee, Timothy Sent: Tuesday, October 09, 2012 11:17 AM To: Grob, George Cc: Phillips, Wesley; Parker, Richard; Wu, Simon; Bloch, David Subject: LIBOR memo Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

---

**Item ID:** 32004  
**From:** Wu, Simon (b) (6)  
**To:** Phillips, Wesley (b) (6); Grob, George (b) (6); Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Parker, Richard (b) (6); Bloch, David (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 11:37 AM  
**Received:** October 9, 2012 11:37 AM

Done with Fig 2. make it easier to detect the "suppression" visually... From: Wu, Simon Sent: Tuesday, October 09, 2012 11:32 AM To: Phillips, Wesley; Lee, Timothy; Grob, George Cc: Parker, Richard; Bloch, David Subject: RE: LIBOR memo Let me revise the new chart one more time... From: Phillips, Wesley Sent: Tuesday, October 09, 2012 11:27 AM To: Lee, Timothy; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I think that works well. (b) (5)

. Wes From: Lee, Timothy Sent: Tuesday, October 09, 2012 11:17 AM To: Grob, George Cc: Phillips, Wesley; Parker, Richard; Wu, Simon; Bloch, David Subject: LIBOR memo Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## Bloomberg LIBOR article

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**Item ID:** 32005  
**From:** [REDACTED] (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** Bloomberg LIBOR article  
**Sent:** October 9, 2012 11:54 AM  
**Received:** October 9, 2012 11:54 AM

<http://www.bloomberg.com/news/2012-10-08/libor-now-set-by-six-banks-losing-status-as-a-benchmark.html> (b) (6)  
[REDACTED] Federal Housing Finance Agency Office of the Inspector General (b) (6) (direct) | (b) (6) 7 (cell)  
[REDACTED] (b) (6)

## RE: LIBOR memo

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**Item ID:** 32006  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Phillips, Wesley </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1881bcb698c45b096269b8112f87787-Wesley Phil>, Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 12:06 PM  
**Received:** October 9, 2012 12:06 PM

I've added "publicly available" to the second bullet point on page 5.

(b) (5)

But if you still think further detail is needed, let me know. From: Phillips, Wesley Sent: Tuesday, October 09, 2012 11:27 AM To: Lee, Timothy; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I think that works well. (b) (5)

Wes From: Lee, Timothy Sent: Tuesday, October 09, 2012 11:17 AM To: Grob, George Cc: Phillips, Wesley; Parker, Richard; Wu, Simon; Bloch, David Subject: LIBOR memo Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

---

**Item ID:** 32007  
**From:** Bloch, David (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Phillips, Wesley (b) (6)  
Grob, George (b) (6)  
**Cc:** Parker, Richard (b) (6), Wu, Simon (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 12:19 PM  
**Received:** October 9, 2012 12:19 PM

I think it's good as is. From: Lee, Timothy Sent: Tuesday, October 09, 2012 12:07 PM To: Phillips, Wesley; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I've added "publicly available" to the second bullet point on page 5 (b) (5)

(b) (5). But if you still think further detail is needed, let me know. From: Phillips, Wesley Sent: Tuesday, October 09, 2012 11:27 AM To: Lee, Timothy; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I think that works well. (b) (5)

(b) (5) Wes  
From: Lee, Timothy Sent: Tuesday, October 09, 2012 11:17 AM To: Grob, George Cc: Phillips, Wesley; Parker, Richard; Wu, Simon; Bloch, David Subject: LIBOR memo Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

# Disclosure

---

**Item ID:** 32008  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** [REDACTED] (b) (6)  
**Subject:** Disclosure  
**Sent:** October 9, 2012 12:21 PM  
**Received:** October 9, 2012 12:21 PM

Hi (b) (6) You may already be ahead of me on this one, [REDACTED] (b) (5)

[REDACTED]

[REDACTED] (b) (5)

[REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED] :

[REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED]

[REDACTED] I am now highly dismayed and left wondering what to do. If you wish to discuss, I am always happy to hear from you. Best, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

# Friends at the SEC

---

**Item ID:** 32009  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** Friends at the SEC  
**Sent:** October 9, 2012 12:45 PM  
**Received:** October 9, 2012 12:45 PM

Hi David, Following is an excerpt from a note I sent to a contact at DOJ: You may already be ahead of me on this one,

[REDACTED] (b) (5)

[REDACTED]

[REDACTED] (b) (5)

[REDACTED] (b) (5)

[REDACTED]

[REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED]

[REDACTED] I am now highly dismayed and left wondering what to do. If you wish to discuss, I am always happy to hear from you. He replied that this is probably the SEC's turf, which leads me to wonder whether you know anyone there who would appreciate hearing about this. Please let me know if you'd like me to come by to discuss. Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

# Disclosure

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**Item ID:** 32010  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=13914b6ab7b740a5803bb1627981d58a-(b) (6)>  
**Subject:** Disclosure  
**Sent:** October 9, 2012 12:46 PM  
**Received:** October 9, 2012 12:46 PM

Hi (b) (6), Following is an excerpt from a note I sent to a contact at DOJ: (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED]

[REDACTED] I am now highly dismayed and left wondering what to do. If you wish to discuss, I am always happy to hear from you. He replied that this is probably the SEC's turf, which leads me to wonder whether you know anyone there who would appreciate hearing about this. Please let me know if you'd like me to come by to discuss or explain further. Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

# RE: Disclosure

---

Item ID: 32011  
From: [REDACTED] (b) (6)  
To: Lee, Timothy <Timothy.Lee@fhfaig.gov>  
Subject: RE: Disclosure  
Sent: October 9, 2012 1:04 PM  
Received: October 9, 2012 1:04 PM

Hi Tim, I know someone in the Structured Finance group that I can put you in contact with. [REDACTED] (b) (5). We should speak in person.

Thanks, [REDACTED] (b) (6) From: Lee, Timothy Sent: Tuesday, October 09, 2012 12:47 PM To: [REDACTED] (b) (6) Subject: Disclosure  
Hi [REDACTED] (b) (6), Following is an excerpt from a note I sent to a contact at DOJ: [REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (b) (5)

[REDACTED]

[REDACTED] I am now highly dismayed and left wondering what to do. If you wish to discuss, I am always happy to hear from you. He replied that this is probably the SEC's turf, which leads me to wonder whether you know anyone there who would appreciate hearing about this. Please let me know if you'd like me to come by to discuss or explain further. Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

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**Item ID:** 32012  
**From:** Grob, George (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
**Cc:** Wu, Simon (b) (6), Bloch, David (b) (6), Phillips, Wesley (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 1:07 PM  
**Received:** October 9, 2012 1:07 PM

Richard and Tim, This is very well written, especially for its straightforward clarity of a complex topic. As far as I am concerned, it is fine as is. However, I offer for your consideration a few comments on the last page. (b) (5)

(b) (5)  
(b) (5)  
(b) (5)

(b) (5). George From: Lee, Timothy Sent: Tuesday, October 09, 2012 12:07 PM To: Phillips, Wesley; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I've added "publicly available" to the second bullet point on page 5. My intention had been to make the point about publicly available information by talking about the provenance of our data on pages 4 and 5. But if you still think further detail is needed, let me know. From: Phillips, Wesley Sent: Tuesday, October 09, 2012 11:27 AM To: Lee, Timothy; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I think that works well (b) (5)

(b) (5). Wes From: Lee, Timothy Sent: Tuesday, October 09, 2012 11:17 AM To: Grob, George Cc: Phillips, Wesley; Parker, Richard; Wu, Simon; Bloch, David Subject: LIBOR memo Hi all, Here is the newest Sharepoint draft of the LIBOR memo, which is now the definitive version. We have cleaned up the graphics per Wes' suggestion and tightened the timeframe to mid-2010, which we can support by media reports on the existing lawsuits. We have also rearranged the order of the recommendations. The cleaned-up Excel data sheet is also available. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR action memo Oct 9 with gg comments.docx**

**Original view**

8 pages (displayed on pages 3 to 10)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

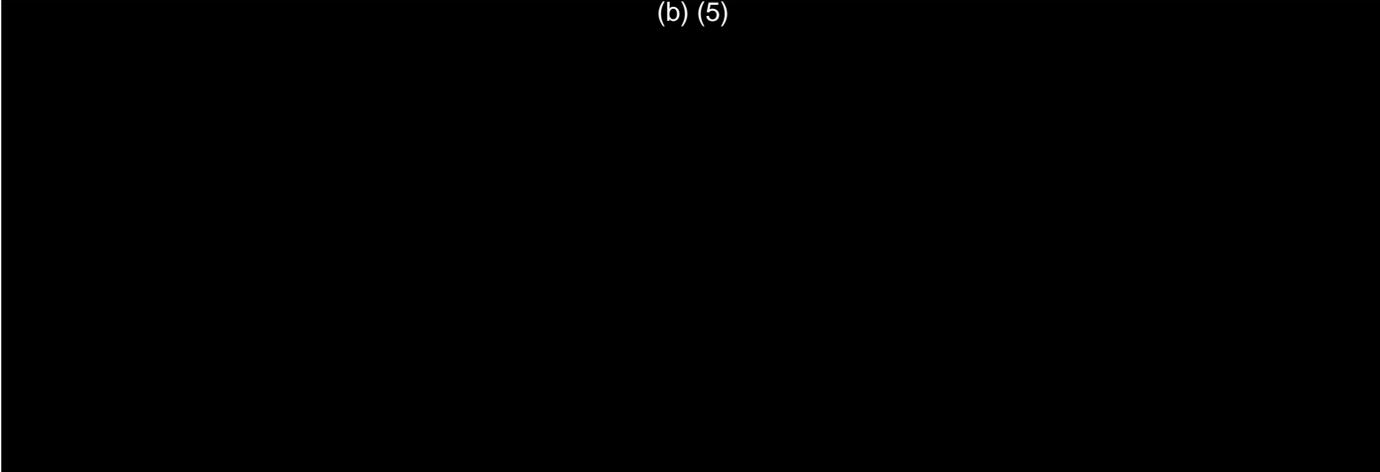
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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

---

(b) (5)



In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR,<sup>1</sup> a market-standard index used to calculate payments on over \$300 trillion of financial instruments and described as “the most important figure in finance,”<sup>2</sup> to its own advantage. According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>3</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>4</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.

Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.”<sup>5</sup>

## Background

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>6</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises' ability to remain viable entities through Senior Preferred Share Purchase Agreements ("PSPAs") with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>7</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>8</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets, on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders' market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- **Floating rate bonds.** Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship, and still holds \$132 billion in such instruments as of June 30, 2012.<sup>9</sup>
- **Interest rate swaps.** Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>a</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in

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<sup>a</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of a specified index. LIBOR is the principal index used for US dollar investments, including floating rate bonds and interest rate derivatives.<sup>10</sup> It is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>11</sup>

### FHFA-OIG Analysis

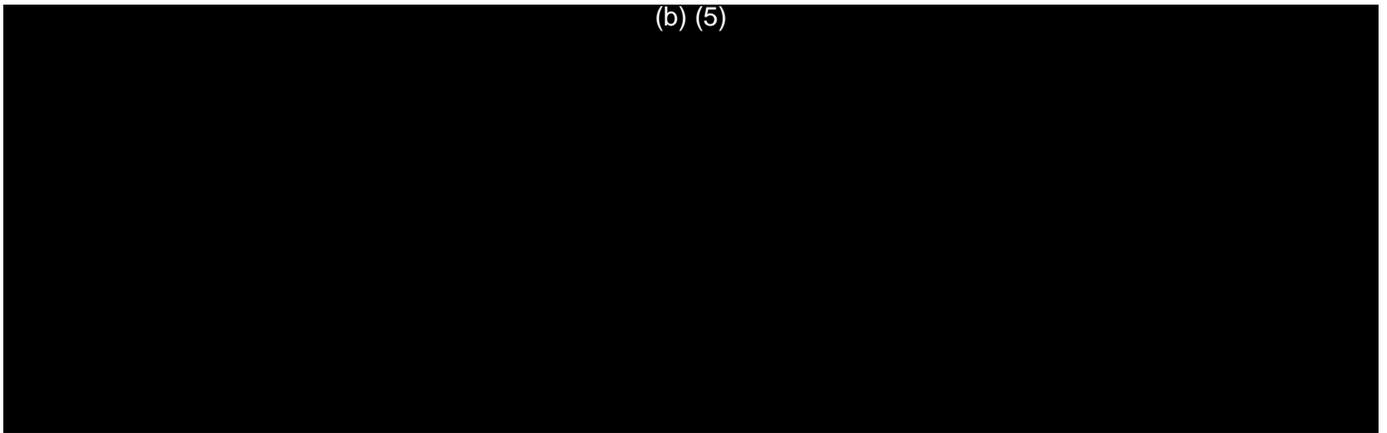
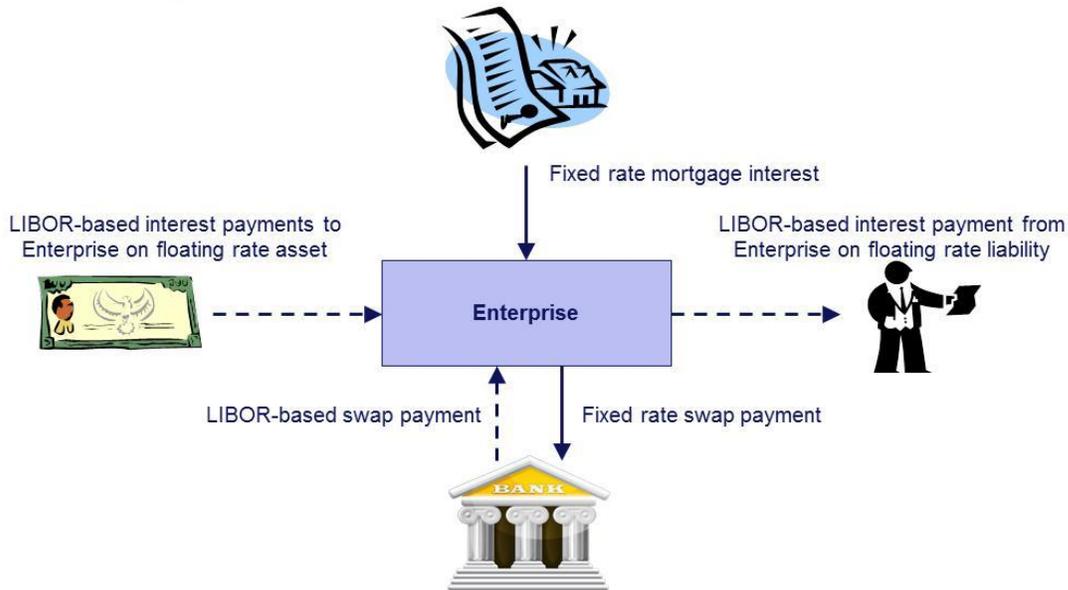


Figure 1. LIBOR-Based Payments to and From the Enterprises



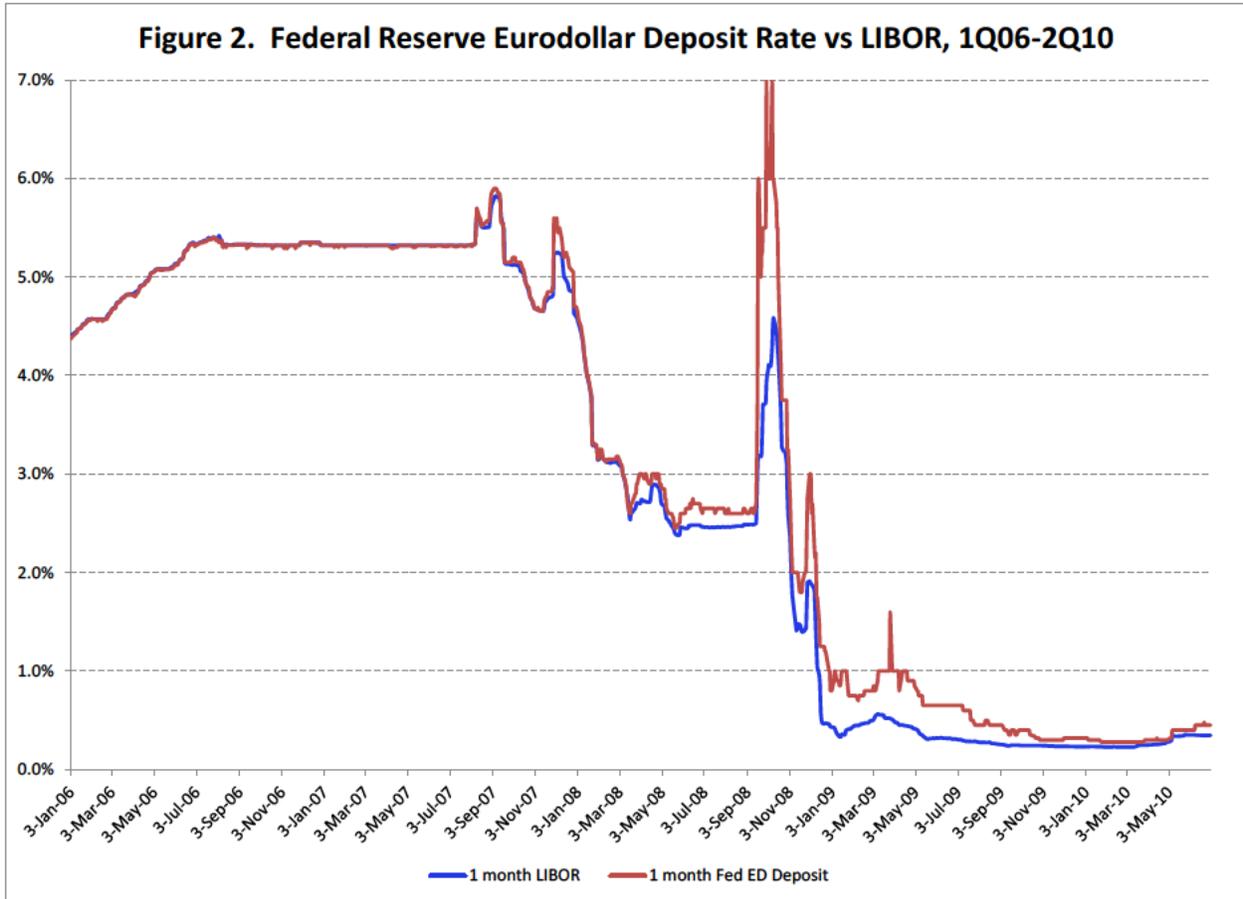


Figure 2 illustrates the historical correlation of these two measures. Before mid-2007, the difference remained near zero. A former Federal Reserve economist observed, “effectively, these two rates should be the same as they are the same instrument.”<sup>16</sup> However, as the

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<sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>5</sup> University of Pennsylvania, "[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)", July 18, 2012

<sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."

<sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.

<sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>18</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>19</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

<sup>20</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010.

<sup>21</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>d</sup> FHFA-OIG's Office of Evaluations, led by George Grob, and Office of Policy, Oversight and Review, led by Richard Parker, shared in the creation of this memorandum. Research and analysis were led by Timothy Lee, Senior Policy Advisor, David P. Bloch, Investigative Counsel, and Simon Z. Wu, Chief Economist. Valuable assistance was also provided by (b) (6) Auditor.

## RE: LIBOR memo

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**Item ID:** 32014  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 1:28 PM  
**Received:** October 9, 2012 1:28 PM

Hi George, Thanks for your comments. They make perfect sense, but all the same I would benefit from a little more discussion on the specifics. Could David and I swing by for 15 minutes? Tim From: Grob, George Sent: Tuesday, October 09, 2012 1:07 PM To: Lee, Timothy; Parker, Richard Cc: Wu, Simon; Bloch, David; Phillips, Wesley Subject: RE: LIBOR memo Richard and Tim, This is very well written, especially for its straightforward clarity of a complex topic. As far as I am concerned, it is fine as is. However, I offer for your consideration a few comments on the last page. [REDACTED] (b) (5)

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[REDACTED]

[REDACTED] (b) (5)

[REDACTED] . George From: Lee, Timothy Sent: Tuesday, October 09, 2012 12:07 PM To: Phillips, Wesley; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I've added "publicly available" to the second bullet point on page 5. My intention had been to make the point about publicly available information by talking about the provenance of our data on pages 4 and 5. But if you still think further detail is needed, let me know. From: Phillips, Wesley Sent: Tuesday, October 09, 2012 11:27 AM To: Lee, Timothy; Grob, George Cc: Parker, Richard; Wu, Simon; Bloch, David Subject: RE: LIBOR memo I think that works well. [REDACTED] (b) (5)

[REDACTED]

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## RE: LIBOR memo

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**Item ID:** 32015  
**From:** Grob, George (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: LIBOR memo  
**Sent:** October 9, 2012 1:29 PM  
**Received:** October 9, 2012 1:29 PM

I am here now. From: Lee, Timothy Sent: Tuesday, October 09, 2012 1:29 PM To: Grob, George Cc: Parker, Richard; Bloch, David Subject: RE: LIBOR memo Hi George, Thanks for your comments. They make perfect sense, but all the same I would benefit from a little more discussion on the specifics. Could David and I swing by for 15 minutes? Tim  
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## LIBOR memo - George's comments

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**Item ID:** 32016  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** LIBOR memo - George's comments  
**Sent:** October 9, 2012 2:31 PM  
**Received:** October 9, 2012 2:31 PM

[https://sharepoint.fhfaog.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%209%20with%20gg%20comments.docx](https://sharepoint.fhfaog.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%209%20with%20gg%20comments.docx) Hi George, Per our conversation, I added one sentence preceding the recommendations that I think gets to your point (highlighted, toward the back). We will touch on the other points with Rich before I make further changes. Tim PS. David, I also straightened out your official title.

## Emailing: LIBOR action memo Oct 9 with gg comments.docx

**Item ID:** 32017  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>  
**Subject:** Emailing: LIBOR action memo Oct 9 with gg comments.docx  
**Sent:** October 9, 2012 4:37 PM  
**Received:** October 9, 2012 4:37 PM

Hi Old Salt,

This incorporates George's comments, toward the back. Per an informal conversation with him and David, I have only addressed one immediately (it's highlighted). The plan was to touch base with you about the others. There was some mention of putting this document through the regular report process, but I pointed out that the gestation of this memo has been over three months anyway (since right after the July 4 holiday). [REDACTED] (b) (5)

[REDACTED]. Emilia has also pointed out that members of Congress have already expressed a good deal of interest in the topic, so that may only add to the impetus for timeliness.

I will have my phone with me if questions or comments arise.

Tim

**Attachment #1**

**LIBOR action memo Oct 9 with gg comments.docx**

**Original view**

8 pages (displayed on pages 3 to 10)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

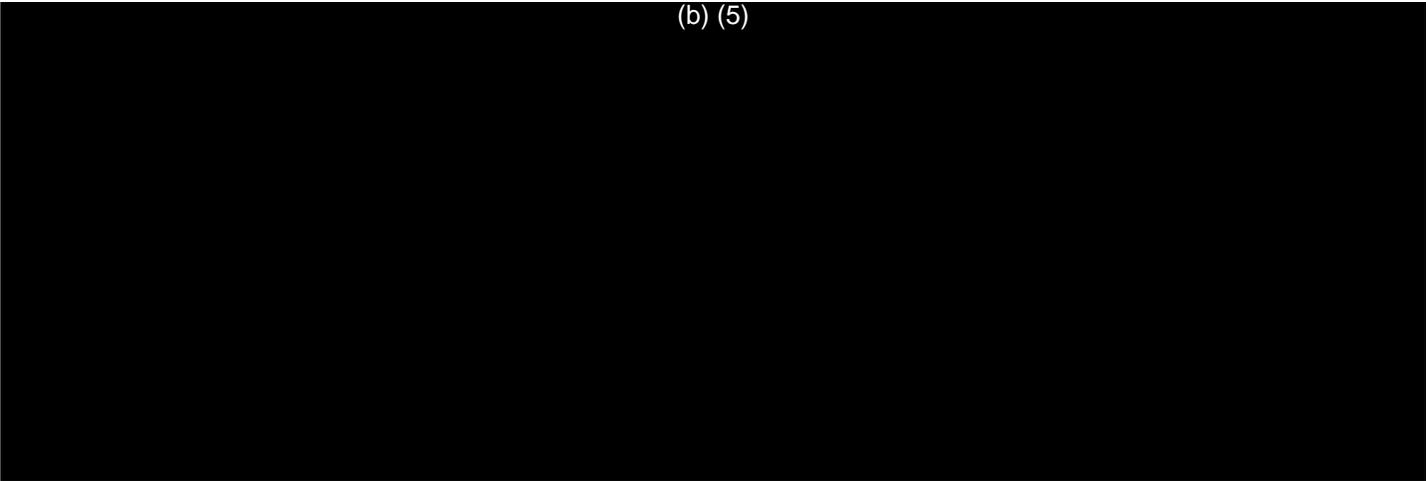
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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

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(b) (5)



In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR,<sup>1</sup> a market-standard index used to calculate payments on over \$300 trillion of financial instruments and described as “the most important figure in finance,”<sup>2</sup> to its own advantage. According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>3</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>4</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.

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As part of their business, the Enterprises have always held substantial quantities of floating-rate assets, on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders' market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

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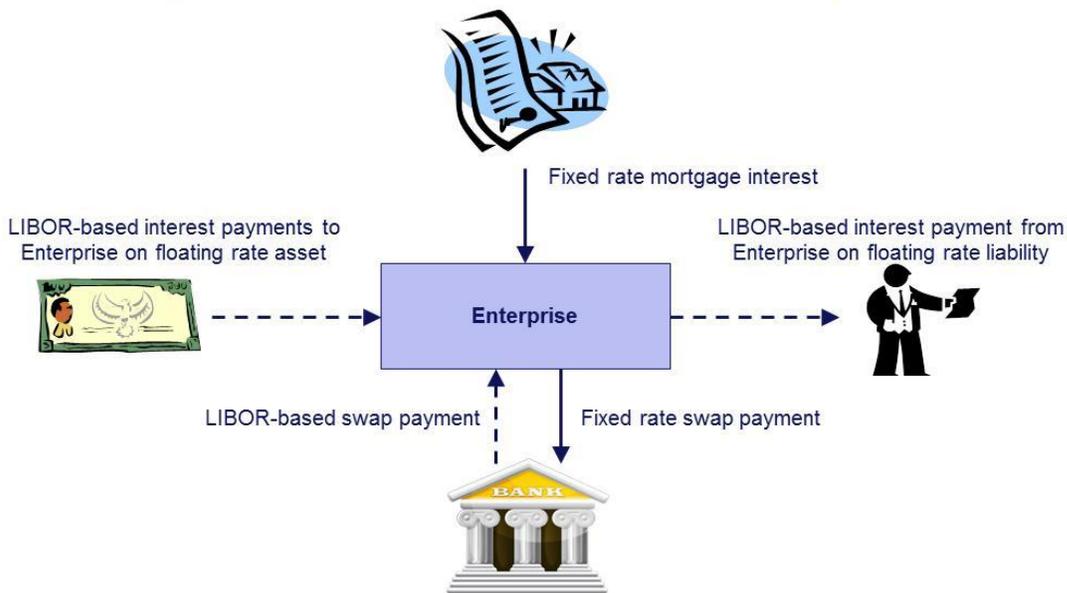
stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

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### FHFA-OIG Analysis

(b) (5)

Figure 1. LIBOR-Based Payments to and From the Enterprises



(b) (5)

(b) (5)

(b) (5)

(b) (5)

<sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>5</sup> University of Pennsylvania, "[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)", July 18, 2012

<sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."

<sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.

<sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>18</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>19</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

<sup>20</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010.

<sup>21</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>d</sup> FHFA-OIG's Office of Evaluations, led by George Grob, and Office of Policy, Oversight and Review, led by Richard Parker, shared in the creation of this memorandum. Research and analysis were led by Timothy Lee, Senior Policy Advisor; David P. Bloch, [Director of the Division of Mortgage, Investments, and Risk Analysis](#); and Simon Z. Wu, Chief Economist. Valuable assistance was also provided by Christopher Sim, Auditor.

## RE: DOJ and disclosure

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**Item ID:** 32019  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** RE: DOJ and disclosure  
**Sent:** October 10, 2012 9:22 AM  
**Received:** October 10, 2012 9:22 AM

Hi Old Salt, I think it would be interesting to get a sense of their view of the LIBOR matter (including the Enterprises' exposure), as well as open a channel generally. This morning I had breakfast with the husband of my wife's old boss at Sacred Heart in New York. He is now a senior exec at a real estate firm in California. Perhaps more interestingly, he is a Navy reservist, trained as a Naval Gunfire Liaison Officer. NGLOs help the Marines in ways analogous to how Air Force JTACs help Army units. (I told him it was a shame you weren't there to share sea stories with him.) He tells me that on his last annual cruise, he participated in a DoD war game with an integrated team. By "integrated" I mean not just Navy and Marines figuring out how to sink shipping and get ashore, but a whole range of folks brought in to consider the more holistic implications of military action. If we cut off a shipping lane, what are the implications for the economies of our enemy's neighbors? What does this mean for our own economy? How does this play out in the media? There were State Department, Commerce Department and civilian intelligence people at the exercise, right there besides the military representatives. Listening to him speak made clear the point to me that more information, connections and relationships don't just add to our ability to succeed in exceptional circumstances, they multiply it. Tim

From: Parker, Richard Sent: Tuesday, October 09, 2012 3:30 PM To: Lee, Timothy Subject: RE: DOJ and disclosure If you want to get SEC to comment on what exposure the Enterprises have, then go for it. Otherwise, I don't see what there is to talk about with them. From: Lee, Timothy Sent: Tuesday, October 09, 2012 3:13 PM To: Parker, Richard Cc: Bloch, David Subject: DOJ and disclosure Hi Old Salt, I reached out to DOJ about the 1933 Act, and their view is that among Federal agencies it would be SEC's turf. I know David Bloch knows people at SEC, so I mentioned it to him. He is confident that he knows someone there who would be happy to take a phone call. Please advise on how to proceed. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: Emailing: LIBOR action memo Oct 9 with gg comments.docx

**Item ID:** 32020  
**From:** Wu, Simon (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
**Cc:** Bloch, David (b) (6) Grob, George (b) (6)  
**Subject:** RE: Emailing: LIBOR action memo Oct 9 with gg comments.docx  
**Sent:** October 10, 2012 9:44 AM  
**Received:** October 10, 2012 9:44 AM

Just a couple of comments.

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From: Lee, Timothy  
Sent: Tuesday, October 09, 2012 4:38 PM  
To: Parker, Richard  
Cc: Bloch, David; Grob, George; Wu, Simon  
Subject: Emailing: LIBOR action memo Oct 9 with gg comments.docx

Hi Old Salt,

This incorporates George's comments, toward the back. Per an informal conversation with him and David, I have only addressed one immediately (it's highlighted). The plan was to touch base with you about the others. There was some mention of putting this document through the regular report process, but I pointed out that the gestation of this memo has been over three months anyway (since right after the July 4 holiday). (b) (5)

. Emilia has also pointed out that members of Congress have already expressed a good deal of interest in the topic, so that may only add to the impetus for timeliness.

I will have my phone with me if questions or comments arise.

Tim << File: LIBOR action memo Oct 9 with gg comments.docx >>

**Attachment #1**

**LIBOR action memo Oct 9 with gg comments\_Simon Wu Comments.docx**

**Original view**

8 pages (displayed on pages 3 to 10)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

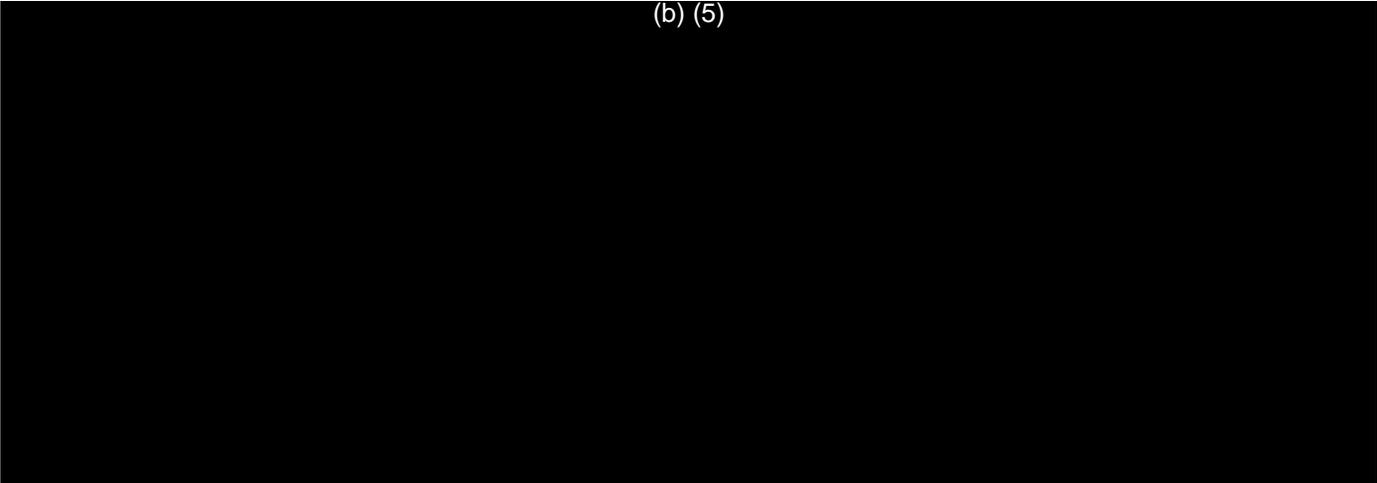
---

400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

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(b) (5)



In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR,<sup>1</sup> a market-standard index used to calculate payments on over \$300 trillion of financial instruments and described as “the most important figure in finance,”<sup>2</sup> to its own advantage. According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>3</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>4</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.

Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.”<sup>5</sup>

## Background

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>6</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises' ability to remain viable entities through Senior Preferred Share Purchase Agreements ("PSPAs") with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>7</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>8</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets, on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders' market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- **Floating rate bonds.** Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship, and still holds \$132 billion in such instruments as of June 30, 2012.<sup>9</sup>
- **Interest rate swaps.** Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>a</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in

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<sup>a</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

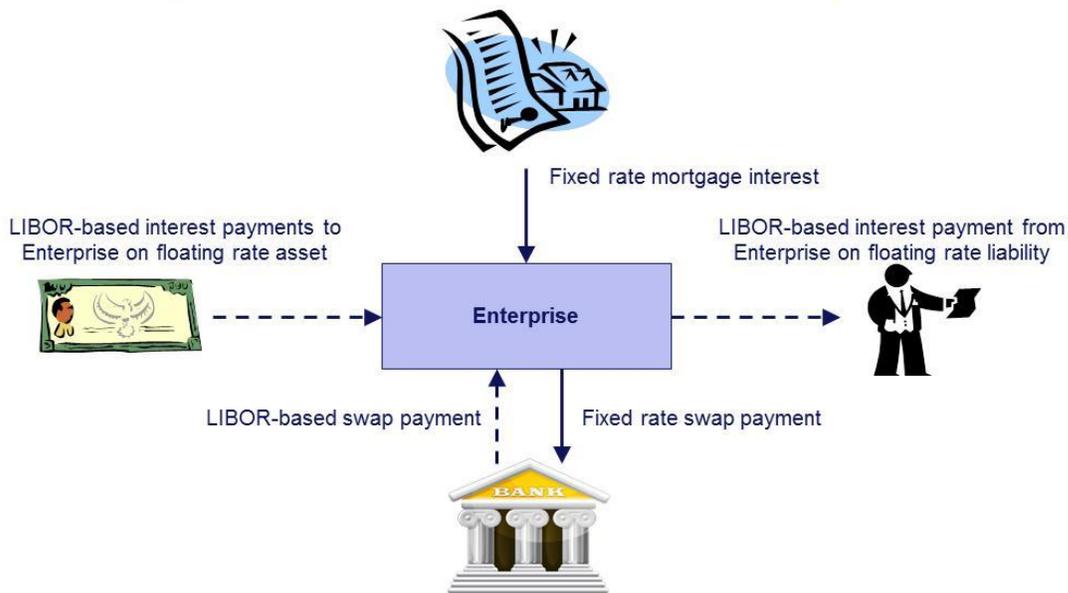
stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of a specified index. LIBOR is the principal index used for US dollar investments, including floating rate bonds and interest rate derivatives.<sup>10</sup> It is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>11</sup>

### FHFA-OIG Analysis

(b) (5)

Figure 1. LIBOR-Based Payments to and From the Enterprises



(b) (5)

(b) (5)

(b) (5)

(b) (5)

<sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>5</sup> University of Pennsylvania, "[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)", July 18, 2012

<sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."

<sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.

<sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>18</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>19</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

<sup>20</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010.

<sup>21</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

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<sup>d</sup> FHFA-OIG's Office of Evaluations, led by George Grob, and Office of Policy, Oversight and Review, led by Richard Parker, shared in the creation of this memorandum. Research and analysis were led by Timothy Lee, Senior Policy Advisor; David P. Bloch, [Director of the Division of Mortgage, Investments, and Risk Analysis](#); and Simon Z. Wu, Chief Economist. Valuable assistance was also provided by Christopher Sim, Auditor.

## **See my revised Figure 2 chart**

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**Item ID:** 32022  
**From:** Wu, Simon (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
**Cc:** Bloch, David (b) (6) Grob, George (b) (6)  
**Subject:** See my revised Figure 2 chart  
**Sent:** October 10, 2012 9:52 AM  
**Received:** October 10, 2012 9:52 AM

[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32023  
**From:** Parker, Richard (b) (6)  
**To:** Wu, Simon (b) (5), Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Bloch, David (b) (6), Grob, George (b) (6)  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 10:01 AM  
**Received:** October 10, 2012 10:01 AM

If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart

[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32025  
**From:** Wu, Simon (b) (6)  
**To:** Parker, Richard (b) (6), Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Bloch, David (b) (6), Grob, George (b) (6)  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 10:03 AM  
**Received:** October 10, 2012 10:03 AM

I was just suggesting pasting this chart from the spreadsheet to the Word file...that's pretty easy to do, if we all agree this is a better way to present our story for Figure 2. No need to link these charts there. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart  
[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32024  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>  
**Cc:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 10:05 AM  
**Received:** October 10, 2012 10:05 AM

I would advocate for electronic release. Moreover, my opinion is that the handful of graphs complement the overall presentation – I deliberately kept the number limited. My view is that the JPEG cut-and-paste provides a better visual product, but we could incorporate a linked graph. In fact, if asked, we could release the Excel sheet itself for the real numbers geeks to pore through. My confidence level is such that I would be perfectly content to add notations and my phone number to a public Excel file release. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart [https://sharepoint.fhfaog.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaog.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32026  
**From:** Parker, Richard (b) (6)  
**To:** Wu, Simon (b) (6); Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Bloch, David (b) (6); Grob, George (b) (6)  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 10:13 AM  
**Received:** October 10, 2012 10:13 AM

Please cut and paste as you suggest, Simon. We should decide the rest as a group. From: Wu, Simon Sent: Wednesday, October 10, 2012 10:04 AM To: Parker, Richard; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I was just suggesting pasting this chart from the spreadsheet to the Word file...that's pretty easy to do, if we all agree this is a better way to present our story for Figure 2. No need to link these charts there. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart  
[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32027  
**From:** Wu, Simon (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
**Cc:** Bloch, David (b) (6), Grob, George (b) (6)  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 10:14 AM  
**Received:** October 10, 2012 10:14 AM

I pasted in the revised Figure 2 into the Word doc. I'd recommend just send them the Word document this round. If they ask for more information and decide to proceed further, we can send them the spreadsheet back-ups. Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024 Voice: (b) (6) From: Lee, Timothy Sent: Wednesday, October 10, 2012 10:06 AM To: Parker, Richard; Wu, Simon Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I would advocate for electronic release. Moreover, my opinion is that the handful of graphs complement the overall presentation – I deliberately kept the number limited. My view is that the JPEG cut-and-paste provides a better visual product, but we could incorporate a linked graph. In fact, if asked, we could release the Excel sheet itself for the real numbers geeks to pore through. My confidence level is such that I would be perfectly content to add notations and my phone number to a public Excel file release. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart [https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

**Attachment #1**

**LIBOR action memo Oct 9 with gg comments\_Simon Wu Comments.docx**

**Original view**

8 pages (displayed on pages 3 to 10)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 9, 2012

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(b) (5)

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- **Interest rate swaps.** Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>a</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in

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<sup>a</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

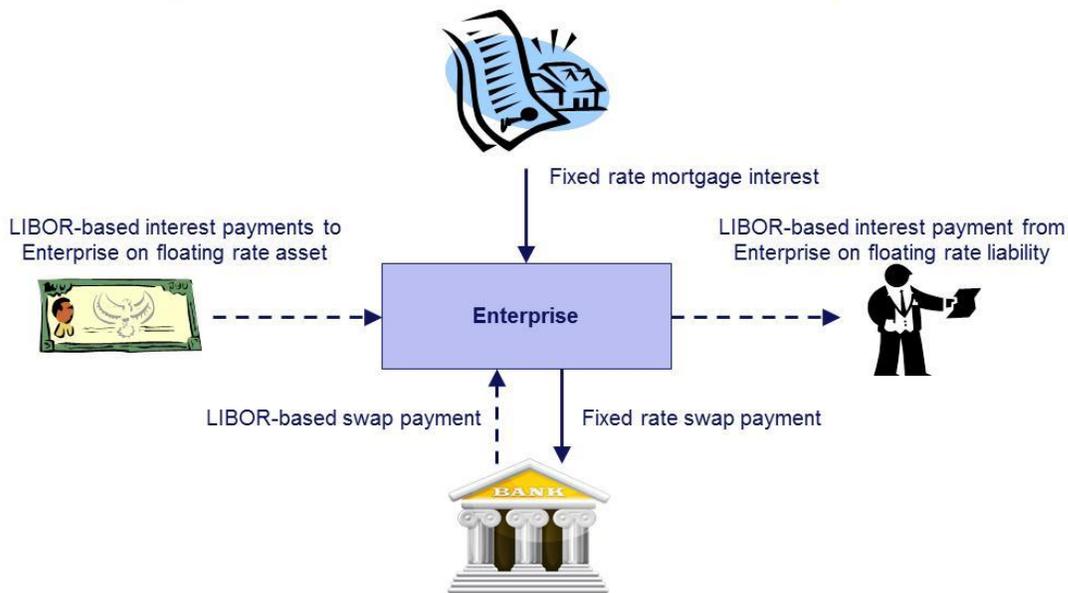
stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or “notional” amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of a specified index. LIBOR is the principal index used for US dollar investments, including floating rate bonds and interest rate derivatives.<sup>10</sup> It is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>11</sup>

### FHFA-OIG Analysis

(b) (5)

Figure 1. LIBOR-Based Payments to and From the Enterprises



(b) (5)

(b) (5)

(b) (5)

(b) (5)

<sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>5</sup> University of Pennsylvania, "[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)", July 18, 2012

<sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."

<sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.

<sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>18</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>19</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

<sup>20</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010.

<sup>21</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>d</sup> FHFA-OIG's Office of Evaluations, led by George Grob, and Office of Policy, Oversight and Review, led by Richard Parker, shared in the creation of this memorandum. Research and analysis were led by Timothy Lee, Senior Policy Advisor; David P. Bloch, **Director of the Division of Mortgage, Investments, and Risk Analysis**; and Simon Z. Wu, Chief Economist. Valuable assistance was also provided by **(b) (6)** Auditor.

## LIBOR Theory of Harm to GOvernmental Entities Explained.

**Item ID:** 32029  
**From:** Parker, Richard (b) (6)  
**To:** Linick, Steve (b) (6) Stephens, Michael  
(b) (6) DiSanto, Emilia (b) (6)  
**Cc:** Grob, George (b) (6) Bloch, David (b) (6), Lee,  
Timothy <Timothy.Lee@fhfaig.gov>  
**Subject:** LIBOR Theory of Harm to GOvernmental Entities Explained.  
**Sent:** October 10, 2012 11:42 AM  
**Received:** October 10, 2012 11:42 AM

The facts in this short article are, essentially, the background contained in our draft action memorandum.

<http://www.moneynews.com/FinanceNews/libor-loss-states-scandal/2012/10/09/id/459170> – R Richard Parker

Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street,  
SW Washington, D.C. 20024 Tel: (b) (6) Cell (b) (5)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32030  
**From:** Bloch, David (b) (6)  
**To:** Wu, Simon (b) (6), Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
**Cc:** Grob, George (b) (6)  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 1:10 PM  
**Received:** October 10, 2012 1:11 PM

(b) (5). From: Wu, Simon Sent: Wednesday, October 10, 2012 10:15 AM  
To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I pasted in the revised Figure 2 into the Word doc. I'd recommend just send them the Word document this round. If they ask for more information and decide to proceed further, we can send them the spreadsheet back-ups. Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024 Voice: (b) (6) From: Lee, Timothy Sent: Wednesday, October 10, 2012 10:06 AM To: Parker, Richard; Wu, Simon Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I would advocate for electronic release. Moreover, my opinion is that the handful of graphs complement the overall presentation – I deliberately kept the number limited. My view is that the JPEG cut-and-paste provides a better visual product, but we could incorporate a linked graph. In fact, if asked, we could release the Excel sheet itself for the real numbers geeks to pore through. My confidence level is such that I would be perfectly content to add notations and my phone number to a public Excel file release. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart  
[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32031  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 1:11 PM  
**Received:** October 10, 2012 1:11 PM

I agree. From: Bloch, David Sent: Wednesday, October 10, 2012 1:11 PM To: Wu, Simon; Lee, Timothy; Parker, Richard Cc: Grob, George Subject: RE: See my revised Figure 2 chart (b) (5)

From: Wu, Simon Sent: Wednesday, October 10, 2012 10:15 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I pasted in the revised Figure 2 into the Word doc. I'd recommend just send them the Word document this round. If they ask for more information and decide to proceed further, we can send them the spreadsheet back-ups. Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024 Voice: (b) (6) From: Lee, Timothy Sent: Wednesday, October 10, 2012 10:06 AM To: Parker, Richard; Wu, Simon Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I would advocate for electronic release. Moreover, my opinion is that the handful of graphs complement the overall presentation – I deliberately kept the number limited. My view is that the JPEG cut-and-paste provides a better visual product, but we could incorporate a linked graph. In fact, if asked, we could release the Excel sheet itself for the real numbers geeks to pore through. My confidence level is such that I would be perfectly content to add notations and my phone number to a public Excel file release. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart

[https://sharepoint.fhfa.ig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfa.ig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32033  
**From:** Parker, Richard (b) (6)  
**To:** Bloch, David (b) (6); Wu, Simon (b) (6), Lee, Timothy <Timothy.Lee@fhfaog.gov>  
**Cc:** Grob, George (b) (6)  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 1:12 PM  
**Received:** October 10, 2012 1:12 PM

Agreed. Figure 2 is better, but we need to rephrase the language in it. Simon, can you pls work with Tim or David on that? From: Bloch, David Sent: Wednesday, October 10, 2012 1:11 PM To: Wu, Simon; Lee, Timothy; Parker, Richard Cc: Grob, George Subject: RE: See my revised Figure 2 chart (b) (5)  
From: Wu, Simon Sent: Wednesday, October 10, 2012 10:15 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I pasted in the revised Figure 2 into the Word doc. I'd recommend just send them the Word document this round. If they ask for more information and decide to proceed further, we can send them the spreadsheet back-ups. Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024 Voice (b) (6) From: Lee, Timothy Sent: Wednesday, October 10, 2012 10:06 AM To: Parker, Richard; Wu, Simon Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I would advocate for electronic release. Moreover, my opinion is that the handful of graphs complement the overall presentation – I deliberately kept the number limited. My view is that the JPEG cut-and-paste provides a better visual product, but we could incorporate a linked graph. In fact, if asked, we could release the Excel sheet itself for the real numbers geeks to pore through. My confidence level is such that I would be perfectly content to add notations and my phone number to a public Excel file release. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart  
[https://sharepoint.fhfaog.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaog.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32032  
**From:** Bloch, David (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 1:12 PM  
**Received:** October 10, 2012 1:12 PM

Anyone else opining on this Tim? From: Lee, Timothy Sent: Wednesday, October 10, 2012 1:12 PM To: Bloch, David  
Subject: RE: See my revised Figure 2 chart I agree. From: Bloch, David Sent: Wednesday, October 10, 2012 1:11 PM  
To: Wu, Simon; Lee, Timothy; Parker, Richard Cc: Grob, George Subject: RE: See my revised Figure 2 chart (b) (5)  
(b) (6) From: Wu, Simon Sent: Wednesday, October 10, 2012 10:15 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I pasted in the revised Figure 2 into the Word doc. I'd recommend just send them the Word document this round. If they ask for more information and decide to proceed further, we can send them the spreadsheet back-ups. Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024  
Voice: (b) (6) From: Lee, Timothy Sent: Wednesday, October 10, 2012 10:06 AM To: Parker, Richard; Wu, Simon Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I would advocate for electronic release. Moreover, my opinion is that the handful of graphs complement the overall presentation – I deliberately kept the number limited. My view is that the JPEG cut-and-paste provides a better visual product, but we could incorporate a linked graph. In fact, if asked, we could release the Excel sheet itself for the real numbers geeks to pore through. My confidence level is such that I would be perfectly content to add notations and my phone number to a public Excel file release. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart  
[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## Appendix

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**Item ID:** 32034  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** Appendix  
**Sent:** October 10, 2012 1:53 PM  
**Received:** October 10, 2012 1:53 PM

Hi Old Salt, Attached is the appendix you requested. I purposely went over all my assumptions in detail. If (b) (6) or (b) (6) want to go through the Excel sheet line by line with me, "bring 'em on." Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**Appendix.docx**

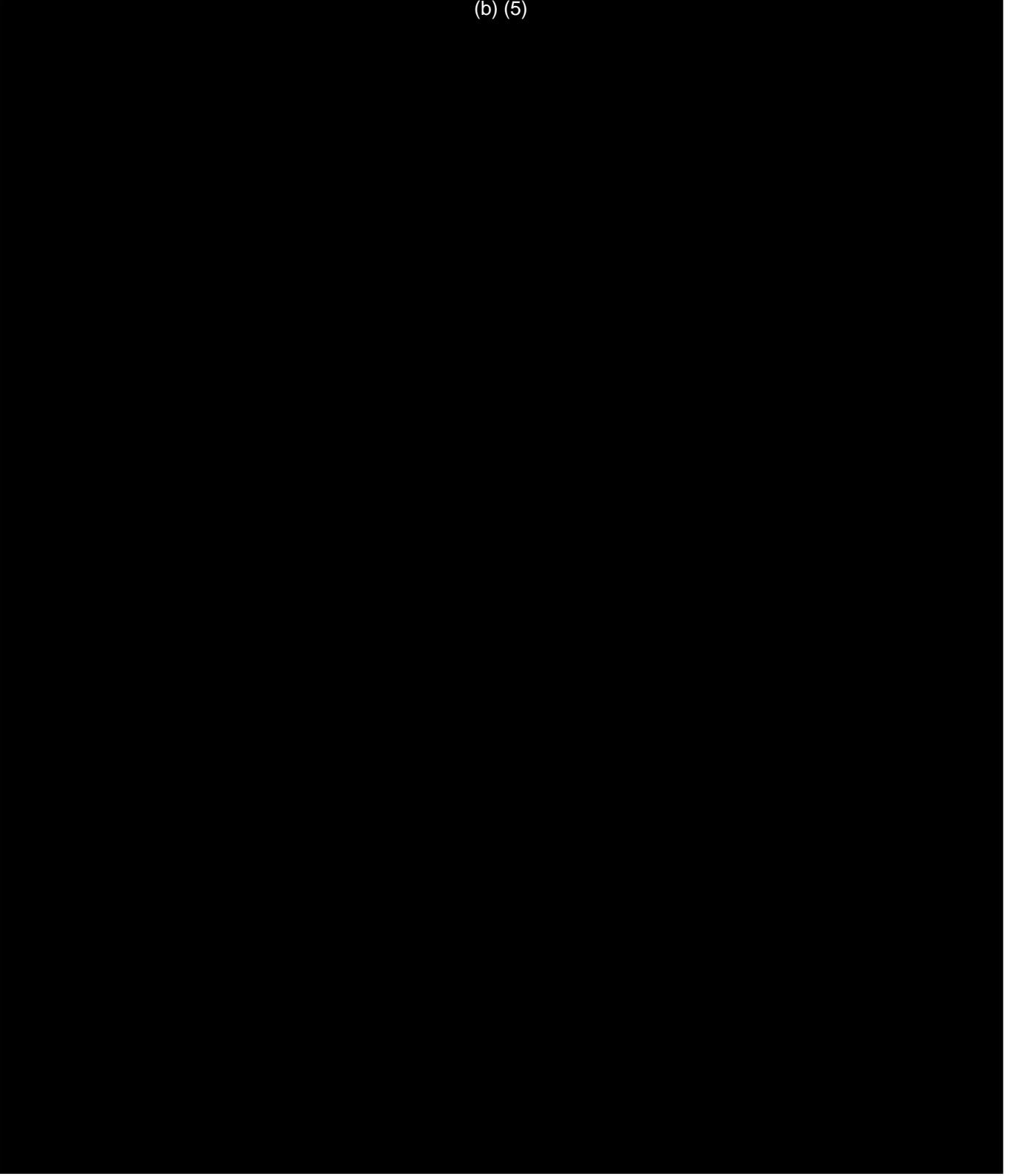
**Original view**

3 pages (displayed on pages 3 to 5)

Appendix

Notes on Analytical Methodology

(b) (5)



(b) (5)

(b) (5)

## **RE: See my revised Figure 2 chart**

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**Item ID:** 32036  
**From:** Wu, Simon (b) (6)  
**To:** Parker, Richard (b) (6) Bloch, David (b) (6)  
Lee, Timothy <Timothy.Lee@fhfaig.gov>  
**Cc:** Grob, George (b) (6)  
**Subject:** RE: See my revised Figure 2 chart  
**Sent:** October 10, 2012 3:04 PM  
**Received:** October 10, 2012 3:04 PM

Ok. Tim and David, Let me know if you have any suggestion for the two text box language for Fig 2. I thought it's better for the chart to tell the story when standing alone, b/c some readers may not have the patience to read the paragraph following Fig 2 to understand what was going on. From: Parker, Richard Sent: Wednesday, October 10, 2012 1:13 PM To: Bloch, David; Wu, Simon; Lee, Timothy Cc: Grob, George Subject: RE: See my revised Figure 2 chart Agreed. Figure 2 is better, but we need to rephrase the language in it. Simon, can you pls work with Tim or David on that? From: Bloch, David Sent: Wednesday, October 10, 2012 1:11 PM To: Wu, Simon; Lee, Timothy; Parker, Richard Cc: Grob, George Subject: RE: (b) (5) . From: Wu, Simon Sent: Wednesday, October 10, 2012 10:15 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I pasted in the revised Figure 2 into the Word doc. I'd recommend just send them the Word document this round. If they ask for more information and decide to proceed further, we can send them the spreadsheet back-ups. Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024 Voice: (b) (6) From: Lee, Timothy Sent: Wednesday, October 10, 2012 10:06 AM To: Parker, Richard; Wu, Simon Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart I would advocate for electronic release. Moreover, my opinion is that the handful of graphs complement the overall presentation – I deliberately kept the number limited. My view is that the JPEG cut-and-paste provides a better visual product, but we could incorporate a linked graph. In fact, if asked, we could release the Excel sheet itself for the real numbers geeks to pore through. My confidence level is such that I would be perfectly content to add notations and my phone number to a public Excel file release. From: Parker, Richard Sent: Wednesday, October 10, 2012 10:02 AM To: Wu, Simon; Lee, Timothy Cc: Bloch, David; Grob, George Subject: RE: See my revised Figure 2 chart If we issue the report to the Acting Director in electronic format couldn't we just link these charts? If we issue in paper, couldn't we include them as an Appendix? Is there a reason not to do so? From: Wu, Simon Sent: Wednesday, October 10, 2012 9:53 AM To: Lee, Timothy; Parker, Richard Cc: Bloch, David; Grob, George Subject: See my revised Figure 2 chart  
[https://sharepoint.fhfaig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx](https://sharepoint.fhfaig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal.xlsx)

## LIBOR memo

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**Item ID:** 32037  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** LIBOR memo  
**Sent:** October 10, 2012 5:01 PM  
**Received:** October 10, 2012 5:01 PM

Gentlemen, Here is the definitive document as of this evening. I took three steps in this new document: · Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart. · Changed the loss language and chart to mention only the estimated net LIBOR manipulation loss, in light of my having incorporated information in the Excel sheet about the Enterprises' LIBOR-based liabilities. For reasons I can discuss in the morning,

(b) (5)

Cleaned

up a couple of the hyperlinks in the endnotes. Also, the appendix on methodology is drafted and awaiting review. -----

Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

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**Item ID:** 32039  
**From:** Parker, Richard [REDACTED] (b) (6) >  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Bloch, David [REDACTED] (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** October 10, 2012 6:32 PM  
**Received:** October 10, 2012 6:32 PM

Who are you calling a gentleman?

Sent from my Windows Phone

From:

Lee, Timothy

Sent:

10/10/2012 5:01 PM

To:

Parker, Richard; Bloch, David

Subject:

LIBOR memo

Gentlemen,

Here is the

definitive document as of this evening.

I took three steps in this new document:

Â·

Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart.

Â·

Changed the loss language and chart to mention only the estimated

net LIBOR manipulation loss, in light of my having incorporated information in the

Excel sheet about the Enterprisesâ€™ LIBOR-based liabilities. For reasons I can discuss in the morning, (b) (5)

Â·

Cleaned up a couple of the hyperlinks in the endnotes.

Also, the

appendix on methodology is drafted and awaiting review.

-----

Timothy Lee

Senior Policy Advisor, FHFA-OIG

202-730-2821

## RE: LIBOR memo

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**Item ID:** 32040  
**From:** Lee, Timothy </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9770D766B6642C4AC0F9F116D0B180D-TIMOTHY LEE>  
**To:** Parker, Richard </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** RE: LIBOR memo  
**Sent:** October 10, 2012 8:02 PM  
**Received:** October 10, 2012 8:02 PM

Um, didn't it say so right there on your commission?

Sent from my Windows Phone

From:

Parker, Richard

Sent:

10/10/2012 18:32

To:

Lee, Timothy; Bloch, David

Subject:

RE: LIBOR memo

Who are you calling a gentleman?

Sent from my Windows Phone

From:

Lee, Timothy

Sent:

10/10/2012 5:01 PM

To:

Parker, Richard; Bloch, David

Subject:

LIBOR memo

Gentlemen,

Here is the

definitive document as of this evening.

I took three steps in this new document:

Â·

Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart.

Â·

Changed the loss language and chart to mention only the estimated

net LIBOR manipulation loss, in light of my having incorporated information in the

Excel sheet about the Enterprisesâ€™ LIBOR-based liabilities. For reasons I can discuss in the morning, (b) (5)

Â·

Cleaned up a couple of the hyperlinks in the endnotes.

Also, the

appendix on methodology is drafted and awaiting review.

-----

Timothy Lee

Senior Policy Advisor, FHFA-OIG

202-730-2821

## RE: LIBOR memo

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**Item ID:** 32038  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: LIBOR memo  
**Sent:** October 10, 2012 10:52 PM  
**Received:** October 10, 2012 10:52 PM

Just messin' with ya', Skipper. It's good to sail with you.

Sent from my Windows Phone

From:

Lee, Timothy

Sent:

10/10/2012 8:02 PM

To:

Parker, Richard

Subject:

RE: LIBOR memo

Um, didn't it say so right there on your commission?

Sent from my Windows Phone

From:

Parker, Richard

Sent:

10/10/2012 18:32

To:

Lee, Timothy; Bloch, David

Subject:

RE: LIBOR memo

Who are you calling a gentleman?

Sent from my Windows Phone

From:

Lee, Timothy

Sent:

10/10/2012 5:01 PM

To:

Parker, Richard; Bloch, David

Subject:

LIBOR memo

Gentlemen,

Here is the

definitive document as of this evening.

I took three steps in this new document:

Â·

Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart.

Â·

Changed the loss language and chart to mention only the estimated

net LIBOR manipulation loss, in light of my having incorporated information in the

Excel sheet about the Enterprises'™ LIBOR-based liabilities. For reasons I can discuss in the morning, (b) (5)

Â·

Cleaned up a couple of the hyperlinks in the endnotes.

Also, the

appendix on methodology is drafted and awaiting review.

-----

Timothy Lee

Senior Policy Advisor, FHFA-OIG

202-730-2821

## FW: LIBOR memo

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**Item ID:** 32041  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Rhinesmith, Alan </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=98d654fcd31f48f7887a69bf4cc5b12d-Alan Rhines>  
**Subject:** FW: LIBOR memo  
**Sent:** October 11, 2012 10:59 AM  
**Received:** October 11, 2012 10:59 AM

From: Lee, Timothy Sent: Wednesday, October 10, 2012 5:02 PM To: Parker, Richard; Bloch, David Subject: LIBOR memo  
Gentlemen, Here is the definitive document as of this evening. I took three steps in this new document: .  
Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart. .  
Changed the loss language and chart to mention only the estimated net LIBOR manipulation loss, in light of my having incorporated information in the Excel sheet about the Enterprises' LIBOR-based liabilities. For reasons I can discuss in the morning, [REDACTED] (b) (5)

[REDACTED] Cleaned up a couple of the hyperlinks in the endnotes. Also, the appendix on methodology is drafted and awaiting review. ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## Back to you: LIBOR memo

---

**Item ID:** 32042  
**From:** Rhinesmith, Alan (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Parker, Richard (b) (6)  
**Subject:** Back to you: LIBOR memo  
**Sent:** October 12, 2012 12:05 PM  
**Received:** October 12, 2012 12:05 PM

Attached and in Sharepoint (

[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2011\\_AR%20edits.docx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2011_AR%20edits.docx) and

[https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/Appendix%20AR%20edits.docx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/Appendix%20AR%20edits.docx) ) are

suggested edits to both documents. My only detailed edit was to the introduction to the memo. I also had one comment about how much to go into the other side (net pay) of the equation. I did not deal with Grob's comments.

Overall I thought the documents were in good shape and won't be offended if you reject my suggested reorganization of the introduction. (The parallel footnoting system – letters and numbers – may have gotten screwed up in the process. Sorry.) From: Lee, Timothy Sent: Thursday, October 11, 2012 10:59 AM To: Rhinesmith, Alan Subject: FW: LIBOR memo From: Lee, Timothy Sent: Wednesday, October 10, 2012 5:02 PM To: Parker, Richard; Bloch, David Subject: LIBOR memo Gentlemen, Here is the definitive document as of this evening. I took three steps in this new document:

- Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart.
- Changed the loss language and chart to mention only the estimated net LIBOR manipulation loss, in light of my having incorporated information in the Excel sheet about the Enterprises' LIBOR-based liabilities. For reasons I can discuss in the morning, (b) (5)

- Cleaned up a couple of the hyperlinks in the endnotes. Also, the appendix on methodology is drafted and awaiting review. ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR action memo Oct 11\_AR edits.docx**

**Original view**

9 pages (displayed on pages 3 to 11)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 12, 2012

(b) (5)

(b) (5)

## Background

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>6</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises' ability to remain viable entities through Senior Preferred Share Purchase Agreements ("PSPAs") with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>7</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>8</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets, on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders' market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- **Floating rate bonds.** Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship, and still holds \$132 billion in such instruments as of June 30, 2012.<sup>9</sup>
- **Interest rate swaps.** Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>c</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. FHFA-OIG estimates that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship, a figure which has since fallen to \$19 billion as of June 30, 2012.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of a specified index. LIBOR is the principal index used for US dollar investments, including floating rate bonds and interest rate derivatives.<sup>10</sup> It is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are

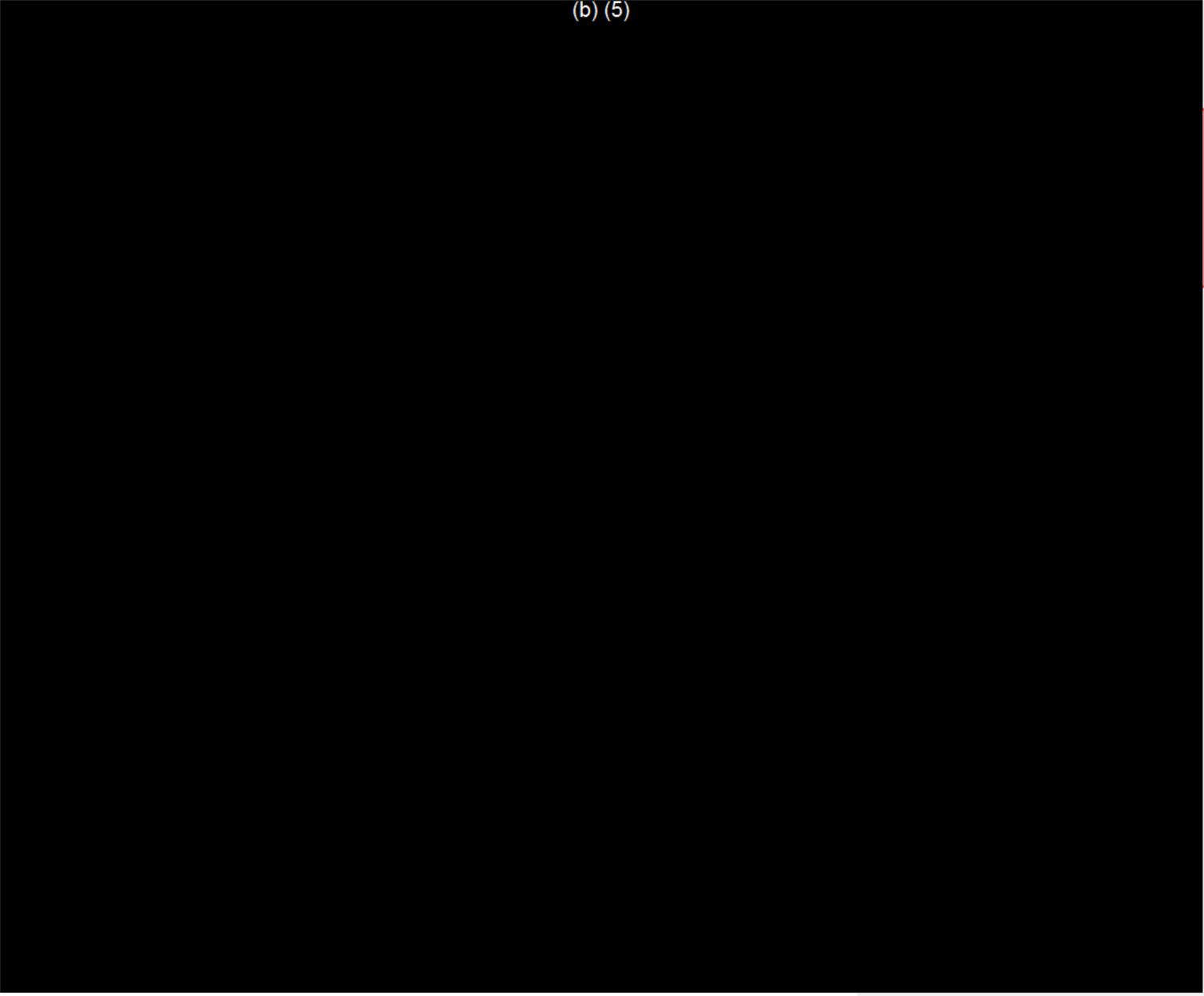
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<sup>c</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>11</sup>

**FHFA-OIG Analysis**

(b) (5)



(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

<sup>1</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>2</sup> ~~The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012~~

<sup>3</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>4</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>5</sup> ~~University of Pennsylvania, "[The LIBOR Mess: How Did It Happen — And What Lies Ahead?](#)," July 18, 2012~~

<sup>6</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)," September 7, 2008, p.6.

<sup>7</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)," January 20, 2010

<sup>8</sup> Federal Housing Finance Agency, "[Data as of August 8 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."

<sup>9</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddie.mac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddie.mac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>10</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>11</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)," July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\) based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.

<sup>14</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>15</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>16</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)" April 30, 2012, pp. 23-31.

<sup>18</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>f</sup> FHFA-OIG's Office of Evaluations, led by George Grob, and Office of Policy, Oversight and Review, led by Richard Parker, shared in the creation of this memorandum. Research and analysis were led by Timothy Lee, Senior Policy Advisor; David P. Bloch, Director of the Division of Mortgage, Investments, and Risk Analysis; and Simon Z. Wu, Chief Economist. Valuable assistance was also provided by Christopher Sim, Auditor.

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<sup>19</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)" March 2012. p.2

<sup>20</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010.

<sup>21</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)" April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)" August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

**Attachment #2**

**Appendix AR edits.docx**

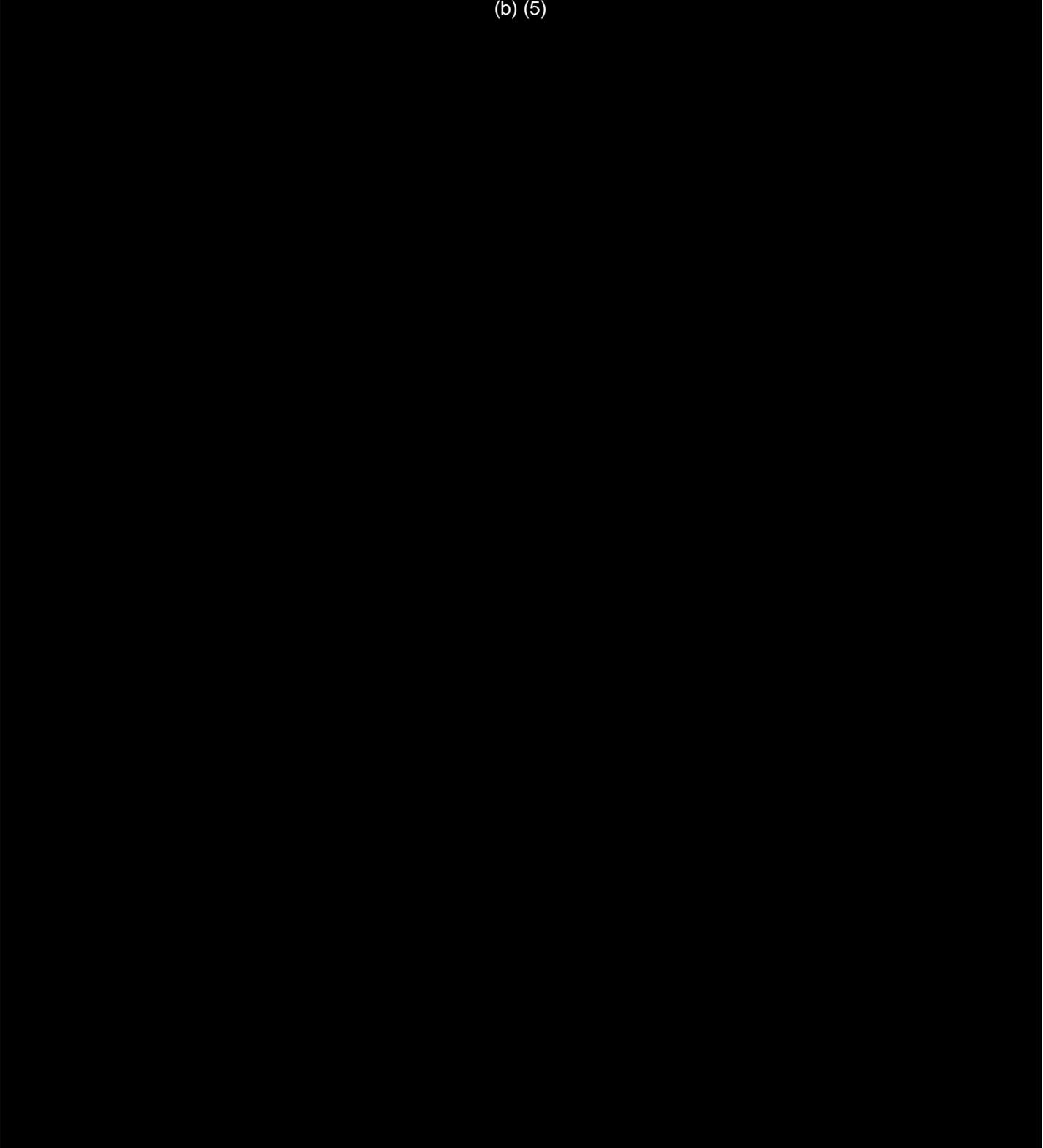
**Original view**

3 pages (displayed on pages 13 to 15)

Appendix

Notes on Analytical Methodology

(b) (5)



(b) (5)

(b) (5)

## **RE: Back to you: LIBOR memo**

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**Item ID:** 32045  
**From:** Parker, Richard (b) (6)  
**To:** Rhinesmith, Alan (b) (6); Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Back to you: LIBOR memo  
**Sent:** October 12, 2012 12:07 PM  
**Received:** October 12, 2012 12:07 PM

Tim, Will you pls ensure that the parallel footnoting system is in good shape before I review Alan's suggestions? I would appreciate that very much Alan, Many thanks for your good work. I appreciate it very much. Also, thanks for not laughing at the stage direction part of my job . . . Rich From: Rhinesmith, Alan Sent: Friday, October 12, 2012 12:05 PM To: Lee, Timothy Cc: Parker, Richard Subject: Back to you: LIBOR memo Attached and in Sharepoint ( [https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2011\\_AR%20edits.docx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2011_AR%20edits.docx) and [https://sharepoint.fhfaoig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/Appendix%20AR%20edits.docx](https://sharepoint.fhfaoig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/Appendix%20AR%20edits.docx) ) are suggested edits to both documents. My only detailed edit was to the introduction to the memo. I also had one comment about how much to go into the other side (net pay) of the equation. I did not deal with Grob's comments. Overall I thought the documents were in good shape and won't be offended if you reject my suggested reorganization of the introduction. (The parallel footnoting system – letters and numbers – may have gotten screwed up in the process. Sorry.) From: Lee, Timothy Sent: Thursday, October 11, 2012 10:59 AM To: Rhinesmith, Alan Subject: FW: LIBOR memo From: Lee, Timothy Sent: Wednesday, October 10, 2012 5:02 PM To: Parker, Richard; Bloch, David Subject: LIBOR memo Gentlemen, Here is the definitive document as of this evening. I took three steps in this new document: · Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart. · Changed the loss language and chart to mention only the estimated net LIBOR manipulation loss, in light of my having incorporated information in the Excel sheet about the Enterprises' LIBOR-based liabilities. For reasons I can discuss in the morning, (b) (5) Cleaned up a couple of the hyperlinks in the endnotes. Also, the appendix on methodology is drafted and awaiting review. ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821



## FW: Back to you: LIBOR memo

---

**Item ID:** 32047  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>  
**Subject:** FW: Back to you: LIBOR memo  
**Sent:** October 12, 2012 12:44 PM  
**Received:** October 12, 2012 12:44 PM

From: Lee, Timothy Sent: Friday, October 12, 2012 12:43 PM To: Parker, Richard; Rhinesmith, Alan Subject: RE: Back to you: LIBOR memo Hi guys, I straightened out the footnoting and incorporated Alan's changes in both the memo and appendix . Aside from the lead-in to the memo, they were very light. Accordingly, I have not put them in track changes. (b) (5)

As Rich has probably heard hundreds of times, "K.I.S.S. It's not just a rock band. Keep it simple, sailor." Tim  
From: Parker, Richard Sent: Friday, October 12, 2012 12:07 PM To: Rhinesmith, Alan; Lee, Timothy Subject: RE: Back to you: LIBOR memo Tim, Will you pls ensure that the parallel footnoting system is in good shape before I review Alan's suggestions? I would appreciate that very much Alan, Many thanks for your good work. I appreciate it very much. Also, thanks for not laughing at the stage direction part of my job . . . Rich  
From: Rhinesmith, Alan Sent: Friday, October 12, 2012 12:05 PM To: Lee, Timothy Cc: Parker, Richard Subject: Back to you: LIBOR memo Attached and in Sharepoint ([https://sharepoint.fhfaioig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2011\\_AR%20edits.docx](https://sharepoint.fhfaioig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2011_AR%20edits.docx) and [https://sharepoint.fhfaioig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/Appendix%20AR%20edits.docx](https://sharepoint.fhfaioig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/Appendix%20AR%20edits.docx) ) are suggested edits to both documents. My only detailed edit was to the introduction to the memo. I also had one comment about how much to go into the other side (net pay) of the equation. I did not deal with Grob's comments. Overall I thought the documents were in good shape and won't be offended if you reject my suggested reorganization of the introduction. (The parallel footnoting system – letters and numbers – may have gotten screwed up in the process. Sorry.)  
From: Lee, Timothy Sent: Thursday, October 11, 2012 10:59 AM To: Rhinesmith, Alan Subject: FW: LIBOR memo  
From: Lee, Timothy Sent: Wednesday, October 10, 2012 5:02 PM To: Parker, Richard; Bloch, David Subject: LIBOR memo Gentlemen, Here is the definitive document as of this evening. I took three steps in this new document: · Resolved the ongoing graphics controversy by reframing Figure 2 so that the text visibly talks right to the chart. · Changed the loss language and chart to mention only the estimated net LIBOR manipulation loss, in light of my having incorporated information in the Excel sheet about the Enterprises' LIBOR-based liabilities. For reasons I can discuss in the morning, (b) (5)

· Cleaned up a couple of the hyperlinks in the endnotes. Also, the appendix on methodology is drafted and awaiting review. ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **Emailing: LIBOR proposal.xlsx**

---

**Item ID:** 32048  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** [REDACTED] (b) (6)  
**Subject:** Emailing: LIBOR proposal.xlsx  
**Sent:** October 15, 2012 9:50 AM  
**Received:** October 15, 2012 9:50 AM

Hi (b) (6)

Per our conversation. The chart is under "Cum Loss Estimate." Happy to walk you through the concepts behind the revision if you like.

Best,

Tim

**Attachment #1**

**LIBOR proposal.xlsx**

**Original view**

211 pages (displayed on pages 3 to 213)

## Cash Flow Shortfall from LIBOR Suppression

### Enterprises Variable Rate Mortgage Assets and Interest Rate Swaps

dollars in millions

Column ver	TL						
	30-Jun-07	30-Sep-07	31-Dec-07	31-Mar-08	30-Jun-08	30-Sep-08	31-Dec-08
<b>Swap Notional Amounts</b>							
<b>Fannie Mae</b>							
Pay Fixed S	303,243	329,657	377,738	443,845	526,028	515,853	546,916
Less: Recei	248,916	256,902	285,885	408,658	409,181	372,555	451,081
Plus: Basis	7,601	8,401	7,001	18,026	25,626	24,761	24,560
Net Receiv	61,928	81,156	98,854	53,213	142,473	168,059	120,395
<b>Freddie Mac</b>							
Less: Rece	214,657	282,070	301,649	326,247	245,054	329,828	279,609
Plus: Pay F	284,927	380,370	409,682	425,450	411,074	452,633	404,359
Plus: Basis	473	1,093	498	17,988	32,205	82,205	82,190
Net Receiv	70,743	99,393	108,531	117,191	198,225	205,010	206,940
<b>Enterprises</b>							
Net Receiv	132,671	180,549	207,385	170,404	340,698	373,069	327,335
<b>Mortgage Related Securities on Balance Sheet</b>							
<b>Fannie Mae</b>							
Capital Ma	333,959	329,158	324,326	314,867	333,124	359,495	362,703
Estimated I	43%	42%	42%	43%	39%	41%	37%
Estimated I	143,728	139,816	136,268	134,230	130,345	146,025	132,796
<b>Freddie Mac</b>							
Fixed Rate	405,650	410,235	417,959	408,735	481,983	437,560	510,116
Variable Ra	306,486	302,929	302,854	303,727	309,815	299,316	294,646
Variable Ra	43%	42%	42%	43%	39%	41%	37%
<b>Floating Rate Liabilities on Balance Sheet</b>							
<b>Fannie Mae</b>							
Floating Rate Short Term Debt			-	4,501	4,501	4,495	7,585
Senior Floa	12,201	15,651	13,700	25,652	33,064	47,087	46,611
<b>Freddie Mac</b>							
Long-Term	24,176	25,487	25,566	23,461	27,093	24,708	13,664
Total Other	483,522	509,744	479,087	469,229	541,851	494,168	466,954
Ratio: Vari	5%	5%	5%	5%	5%	5%	3%



31-Mar-09 30-Jun-09 30-Sep-09 31-Dec-09 31-Mar-10 30-Jun-10 30-Sep-10 31-Dec-10 31-Mar-11

620,850	650,447	435,693	382,600	315,857	317,259	296,877	277,227	270,250
549,823	571,802	340,384	275,417	229,293	234,901	233,613	224,177	214,777
19,815	22,200	11,000	3,225	3,220	3,020	2,485	485	1,565
90,842	100,845	106,309	110,408	89,784	85,378	65,749	53,535	57,038
336,207	284,244	320,458	271,403	255,940	349,545	316,574	324,590	249,793
342,747	401,904	414,776	382,259	382,145	386,194	363,668	394,294	330,015
82,090	51,065	51,615	52,045	54,070	53,910	2,775	2,375	3,375
88,630	168,725	145,933	162,901	180,275	90,559	49,869	72,079	83,597
179,472	269,570	252,242	273,309	270,059	175,937	115,618	125,614	140,635
353,172	369,546	368,389	491,566	434,532	391,615	373,018	361,697	335,762
33%	34%	34%	40%	52%	52%	53%	53%	52%
116,457	124,378	125,616	194,803	224,780	204,120	196,789	190,011	174,970
581,180	550,539	516,778	372,160	159,278	148,851	139,603	137,033	136,725
285,924	279,298	267,393	244,296	170,690	162,049	155,890	151,660	148,780
33%	34%	34%	40%	52%	52%	53%	53%	52%
3,132	3,102	3,069	50	-	-	-	-	
58,770	68,766	51,142	42,592	46,170	45,144	49,502	72,425	74,843
100,938	108,189	97,192	97,713	126,036	144,833	126,248	123,736	
478,379	512,742	460,626	566,780	593,174	585,630	527,318	530,978	532,324
21%	21%	21%	17%	21%	25%	24%	23%	



**30-Jun-11 30-Sep-11 31-Dec-11 31-Mar-12 30-Jun-12**

205,084	193,882	186,757	206,307	229,227
161,151	179,808	229,695	250,322	265,593
2,552	6,997	9,622	18,673	20,922
46,485	21,071	(33,316)	(25,342)	(15,444)

215,758	220,668	211,808	248,453	260,428
321,870	293,683	289,335	296,573	292,660
3,275	2,275	2,750	2,400	2,350
109,387	75,290	80,277	50,520	34,582

155,872	96,361	46,961	25,178	19,138
---------	--------	--------	--------	--------

326,384	318,353	310,143	296,886	285,982
52%	52%	53%	54%	55%
169,673	166,610	165,685	160,482	158,349

133,048	128,918	121,676	114,306	106,577
144,053	141,548	139,556	134,484	132,225
52%	52%	53%	54%	55%

70,914	63,391	72,275	73,551	77,403
--------	--------	--------	--------	--------

506,059	509,108	107,240 512,871 21%	494,455	459,537
---------	---------	---------------------------	---------	---------

242,812	244,767	125,726	221,415	213,171
TRUE	TRUE	TRUE	TRUE	TRUE

#NAME?	#NAME?	#NAME?	#NAME?	#NAME?
--------	--------	--------	--------	--------

#NAME?	#NAME?	#NAME?	#NAME?	#NAME?
#NAME?	#NAME?	#NAME?	#NAME?	#NAME?

#NAME?	#NAME?	#NAME?	#NAME?	#NAME?
#NAME?	#NAME?	#NAME?	#NAME?	#NAME?

Federal  
Reserve  
ED  
Deposits  
Less  
LIBOR, 1  
month  
tenor

**4-Jan-00 through 14-Jun-07**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**15-jun-07 through 7-Sep-08**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**6-sep-08 through 27-jun-12**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

Date	1 month			Date	3 month	
	1 month LIBOR	Fed ED Deposit	1 month Spread		3 month LIBOR	Fed ED Deposit
4-Jan-00	#NAME?	#NAME?	#NAME?	4-Jan-00	#NAME?	#NAME?
5-Jan-00	#NAME?	#NAME?	#NAME?	5-Jan-00	#NAME?	#NAME?
6-Jan-00	#NAME?	#NAME?	#NAME?	6-Jan-00	#NAME?	#NAME?
7-Jan-00	#NAME?	#NAME?	#NAME?	7-Jan-00	#NAME?	#NAME?
10-Jan-00	#NAME?	#NAME?	#NAME?	10-Jan-00	#NAME?	#NAME?
11-Jan-00	#NAME?	#NAME?	#NAME?	11-Jan-00	#NAME?	#NAME?
12-Jan-00	#NAME?	#NAME?	#NAME?	12-Jan-00	#NAME?	#NAME?
13-Jan-00	#NAME?	#NAME?	#NAME?	13-Jan-00	#NAME?	#NAME?
14-Jan-00	#NAME?	#NAME?	#NAME?	14-Jan-00	#NAME?	#NAME?
18-Jan-00	#NAME?	#NAME?	#NAME?	18-Jan-00	#NAME?	#NAME?
19-Jan-00	#NAME?	#NAME?	#NAME?	19-Jan-00	#NAME?	#NAME?
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31-Oct-05	#NAME?	#NAME?	#NAME?	31-Oct-05	#NAME?	#NAME?
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3-Oct-11	#NAME?	#NAME?	#NAME?	3-Oct-11	#NAME?	#NAME?
4-Oct-11	#NAME?	#NAME?	#NAME?	4-Oct-11	#NAME?	#NAME?
5-Oct-11	#NAME?	#NAME?	#NAME?	5-Oct-11	#NAME?	#NAME?
6-Oct-11	#NAME?	#NAME?	#NAME?	6-Oct-11	#NAME?	#NAME?
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11-Oct-11	#NAME?	#NAME?	#NAME?	11-Oct-11	#NAME?	#NAME?
12-Oct-11	#NAME?	#NAME?	#NAME?	12-Oct-11	#NAME?	#NAME?
13-Oct-11	#NAME?	#NAME?	#NAME?	13-Oct-11	#NAME?	#NAME?
14-Oct-11	#NAME?	#NAME?	#NAME?	14-Oct-11	#NAME?	#NAME?
17-Oct-11	#NAME?	#NAME?	#NAME?	17-Oct-11	#NAME?	#NAME?
18-Oct-11	#NAME?	#NAME?	#NAME?	18-Oct-11	#NAME?	#NAME?

19-Oct-11	#NAME?	#NAME?	#NAME?	19-Oct-11	#NAME?	#NAME?
20-Oct-11	#NAME?	#NAME?	#NAME?	20-Oct-11	#NAME?	#NAME?
21-Oct-11	#NAME?	#NAME?	#NAME?	21-Oct-11	#NAME?	#NAME?
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25-Oct-11	#NAME?	#NAME?	#NAME?	25-Oct-11	#NAME?	#NAME?
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28-Oct-11	#NAME?	#NAME?	#NAME?	28-Oct-11	#NAME?	#NAME?
31-Oct-11	#NAME?	#NAME?	#NAME?	31-Oct-11	#NAME?	#NAME?
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22-Nov-11	#NAME?	#NAME?	#NAME?	22-Nov-11	#NAME?	#NAME?
23-Nov-11	#NAME?	#NAME?	#NAME?	23-Nov-11	#NAME?	#NAME?
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30-Nov-11	#NAME?	#NAME?	#NAME?	30-Nov-11	#NAME?	#NAME?
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2-Dec-11	#NAME?	#NAME?	#NAME?	2-Dec-11	#NAME?	#NAME?
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29-Dec-11	#NAME?	#NAME?	#NAME?	29-Dec-11	#NAME?	#NAME?
30-Dec-11	#NAME?	#NAME?	#NAME?	30-Dec-11	#NAME?	#NAME?
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5-Jan-12	#NAME?	#NAME?	#NAME?	5-Jan-12	#NAME?	#NAME?
6-Jan-12	#NAME?	#NAME?	#NAME?	6-Jan-12	#NAME?	#NAME?
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31-Jan-12	#NAME?	#NAME?	#NAME?	31-Jan-12	#NAME?	#NAME?
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2-Feb-12	#NAME?	#NAME?	#NAME?	2-Feb-12	#NAME?	#NAME?
3-Feb-12	#NAME?	#NAME?	#NAME?	3-Feb-12	#NAME?	#NAME?
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10-Feb-12	#NAME?	#NAME?	#NAME?	10-Feb-12	#NAME?	#NAME?
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14-Feb-12	#NAME?	#NAME?	#NAME?	14-Feb-12	#NAME?	#NAME?
15-Feb-12	#NAME?	#NAME?	#NAME?	15-Feb-12	#NAME?	#NAME?
16-Feb-12	#NAME?	#NAME?	#NAME?	16-Feb-12	#NAME?	#NAME?
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29-Feb-12	#NAME?	#NAME?	#NAME?	29-Feb-12	#NAME?	#NAME?
1-Mar-12	#NAME?	#NAME?	#NAME?	1-Mar-12	#NAME?	#NAME?
2-Mar-12	#NAME?	#NAME?	#NAME?	2-Mar-12	#NAME?	#NAME?
5-Mar-12	#NAME?	#NAME?	#NAME?	5-Mar-12	#NAME?	#NAME?

6-Mar-12	#NAME?	#NAME?	#NAME?	6-Mar-12	#NAME?	#NAME?
7-Mar-12	#NAME?	#NAME?	#NAME?	7-Mar-12	#NAME?	#NAME?
8-Mar-12	#NAME?	#NAME?	#NAME?	8-Mar-12	#NAME?	#NAME?
9-Mar-12	#NAME?	#NAME?	#NAME?	9-Mar-12	#NAME?	#NAME?
12-Mar-12	#NAME?	#NAME?	#NAME?	12-Mar-12	#NAME?	#NAME?
13-Mar-12	#NAME?	#NAME?	#NAME?	13-Mar-12	#NAME?	#NAME?
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19-Mar-12	#NAME?	#NAME?	#NAME?	19-Mar-12	#NAME?	#NAME?
20-Mar-12	#NAME?	#NAME?	#NAME?	20-Mar-12	#NAME?	#NAME?
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30-Mar-12	#NAME?	#NAME?	#NAME?	30-Mar-12	#NAME?	#NAME?
2-Apr-12	#NAME?	#NAME?	#NAME?	2-Apr-12	#NAME?	#NAME?
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30-Apr-12	#NAME?	#NAME?	#NAME?	30-Apr-12	#NAME?	#NAME?
1-May-12	#NAME?	#NAME?	#NAME?	1-May-12	#NAME?	#NAME?
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4-May-12	#NAME?	#NAME?	#NAME?	4-May-12	#NAME?	#NAME?
8-May-12	#NAME?	#NAME?	#NAME?	8-May-12	#NAME?	#NAME?
9-May-12	#NAME?	#NAME?	#NAME?	9-May-12	#NAME?	#NAME?
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#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?
#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?





















































































#NAME?

















































USD3MTD156N		USD1MTD156N		DED1		DED3	
lin	Percent	lin	Percent	lin	Percent	lin	Percent
D	Daily	D	Daily	D	Daily	D	Daily
1/1/2000	1986-01-02	1/1/2000	1986-01-02	1/1/2000	1971-01-04	1/1/2000	1971-01-04 to 2012-09
<a href="#">3-Month London Inter</a>		<a href="#">1-Month London Inter</a>		<a href="#">1-Month Eurodollar De</a>		<a href="#">3-Month Eurodollar Deposit Rate</a>	
British Bankers' Associ		British Bankers' Associ		Board of Governors of		Board of Governors of the Federal	
date	value	date	value	date	value	date	value
1/4/2000	6.0	1/4/2000	5.8	1/3/2000	5.7	1/3/2000	5.9
1/5/2000	6.0	1/5/2000	5.8	1/4/2000	5.7	1/4/2000	5.9
1/6/2000	6.0	1/6/2000	5.8	1/5/2000	5.7	1/5/2000	5.9
1/7/2000	6.0	1/7/2000	5.8	1/6/2000	5.7	1/6/2000	5.9
#####	6.0	#####	5.8	1/7/2000	5.7	1/7/2000	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	#N/A	#####	#N/A
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.9	#####	5.7	#####	5.9
#####	6.1	#####	5.9	#####	5.8	#####	6.0
2/1/2000	6.1	2/1/2000	5.9	#####	5.8	#####	6.0
2/2/2000	6.1	2/2/2000	5.9	2/1/2000	5.8	2/1/2000	6.0
2/3/2000	6.1	2/3/2000	5.9	2/2/2000	5.9	2/2/2000	6.1
2/4/2000	6.1	2/4/2000	5.9	2/3/2000	5.8	2/3/2000	6.0
2/7/2000	6.1	2/7/2000	5.9	2/4/2000	5.8	2/4/2000	6.0
2/8/2000	6.1	2/8/2000	5.9	2/7/2000	5.8	2/7/2000	6.0
2/9/2000	6.1	2/9/2000	5.9	2/8/2000	5.8	2/8/2000	6.0
#####	6.1	#####	5.9	2/9/2000	5.8	2/9/2000	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
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#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0





#####	6.7 #####	6.6 7/7/2000	6.5 7/7/2000	6.7
#####	6.7 #####	6.6 #####	6.6 #####	6.7
#####	6.7 #####	6.6 #####	6.6 #####	6.7
#####	6.7 #####	6.6 #####	6.6 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
#####	6.7 #####	6.6 #####	6.5 #####	6.7
8/1/2000	6.7 8/1/2000	6.6 #####	6.5 #####	6.7
8/2/2000	6.7 8/2/2000	6.6 #####	6.5 #####	6.7
8/3/2000	6.7 8/3/2000	6.6 #####	6.5 #####	6.7
8/4/2000	6.7 8/4/2000	6.6 #####	6.5 #####	6.7
8/7/2000	6.7 8/7/2000	6.6 #####	6.5 #####	6.7
8/8/2000	6.7 8/8/2000	6.6 8/1/2000	6.5 8/1/2000	6.7
8/9/2000	6.7 8/9/2000	6.6 8/2/2000	6.5 8/2/2000	6.7
#####	6.7 #####	6.6 8/3/2000	6.5 8/3/2000	6.7
#####	6.7 #####	6.6 8/4/2000	6.5 8/4/2000	6.6
#####	6.7 #####	6.6 8/7/2000	6.5 8/7/2000	6.6
#####	6.7 #####	6.6 8/8/2000	6.5 8/8/2000	6.6
#####	6.7 #####	6.6 8/9/2000	6.5 8/9/2000	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
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#####	6.7 #####	6.6 #####	6.5 #####	6.6
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#####	6.7 #####	6.6 #####	6.5 #####	6.6
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#####	6.7 #####	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6
9/1/2000	6.7 9/1/2000	6.6 #####	6.5 #####	6.6
9/4/2000	6.7 9/4/2000	6.6 #####	6.5 #####	6.6
9/5/2000	6.7 9/5/2000	6.6 #####	6.5 #####	6.6
9/6/2000	6.7 9/6/2000	6.6 #####	6.5 #####	6.6
9/7/2000	6.7 9/7/2000	6.6 #####	6.5 #####	6.6
9/8/2000	6.7 9/8/2000	6.6 #####	6.5 #####	6.6
#####	6.7 #####	6.6 9/1/2000	6.5 9/1/2000	6.6
#####	6.7 #####	6.6 9/4/2000	#N/A 9/4/2000	#N/A
#####	6.7 #####	6.6 9/5/2000	6.5 9/5/2000	6.6
#####	6.7 #####	6.6 9/6/2000	6.5 9/6/2000	6.6
#####	6.7 #####	6.6 9/7/2000	6.5 9/7/2000	6.6
#####	6.7 #####	6.6 9/8/2000	6.5 9/8/2000	6.6
#####	6.7 #####	6.6 #####	6.5 #####	6.6



#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	6.5	#####	6.6
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1/7/2003	1.4	1/7/2003	1.4	#####	1.4	#####	1.4
1/8/2003	1.4	1/8/2003	1.4	#####	1.4	#####	1.4
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4/7/2003	1.3	4/7/2003	1.3	#####	1.3	#####	1.3
4/8/2003	1.3	4/8/2003	1.3	3/3/2003	1.3	3/3/2003	1.3
4/9/2003	1.3	4/9/2003	1.3	3/4/2003	1.3	3/4/2003	1.3
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5/9/2003	1.3	5/9/2003	1.3	#####	1.3	#####	1.2
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8/5/2003	1.1	8/5/2003	1.1	#####	0.9	#####	0.9
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8/7/2003	1.1	8/7/2003	1.1	#####	1.1	#####	1.0
8/8/2003	1.1	8/8/2003	1.1	#####	1.1	#####	1.0
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2/8/2005	2.8	2/8/2005	2.6	#####	2.3	#####	2.4
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3/2/2005	2.9	3/2/2005	2.7	1/3/2005	2.3	1/3/2005	2.5
3/3/2005	3.0	3/3/2005	2.7	1/4/2005	2.3	1/4/2005	2.5
3/4/2005	3.0	3/4/2005	2.8	1/5/2005	2.3	1/5/2005	2.5
3/7/2005	3.0	3/7/2005	2.8	1/6/2005	2.4	1/6/2005	2.6

3/8/2005	3.0	3/8/2005	2.8	1/7/2005	2.4	1/7/2005	2.6
3/9/2005	3.0	3/9/2005	2.8	#####	2.4	#####	2.6
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4/1/2005	3.1	4/1/2005	2.9	#####	2.5	#####	2.7
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4/5/2005	3.1	4/5/2005	2.9	2/2/2005	2.5	2/2/2005	2.7
4/6/2005	3.1	4/6/2005	2.9	2/3/2005	2.5	2/3/2005	2.7
4/7/2005	3.1	4/7/2005	2.9	2/4/2005	2.5	2/4/2005	2.7
4/8/2005	3.1	4/8/2005	2.9	2/7/2005	2.5	2/7/2005	2.7
#####	3.1	#####	2.9	2/8/2005	2.5	2/8/2005	2.7
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5/3/2005	3.2	5/3/2005	3.1	3/1/2005	2.7	3/1/2005	2.9
5/4/2005	3.2	5/4/2005	3.1	3/2/2005	2.7	3/2/2005	2.9
5/5/2005	3.2	5/5/2005	3.1	3/3/2005	2.7	3/3/2005	2.9
5/6/2005	3.2	5/6/2005	3.1	3/4/2005	2.7	3/4/2005	2.9
5/9/2005	3.3	5/9/2005	3.1	3/7/2005	2.7	3/7/2005	2.9
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8/8/2005	3.8	8/8/2005	3.6	6/3/2005	3.1	6/3/2005	3.3
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9/7/2005	3.8	9/7/2005	3.7	7/4/2005	#N/A	7/4/2005	#N/A
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6/8/2006	5.3	6/8/2006	5.2	#####	4.8	#####	5.0
6/9/2006	5.3	6/9/2006	5.2	#####	4.8	#####	5.0
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4/8/2008	2.7	4/8/2008	2.7	1/3/2008	4.6	1/3/2008	4.8
4/9/2008	2.7	4/9/2008	2.7	1/4/2008	4.6	1/4/2008	4.8
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7/9/2008	2.8	7/9/2008	2.5	4/2/2008	3.0	4/2/2008	3.0
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9/3/2008	2.8	9/3/2008	2.5	#####	2.5	#####	2.8
9/4/2008	2.8	9/4/2008	2.5	#####	2.5	#####	2.8
9/5/2008	2.8	9/5/2008	2.5	#####	2.6	#####	2.9
9/8/2008	2.8	9/8/2008	2.5	#####	2.6	#####	2.9
9/9/2008	2.8	9/9/2008	2.5	6/2/2008	2.6	6/2/2008	2.9
#####	2.8	#####	2.5	6/3/2008	2.6	6/3/2008	2.9
#####	2.8	#####	2.5	6/4/2008	2.6	6/4/2008	2.9
#####	2.8	#####	2.5	6/5/2008	2.6	6/5/2008	2.9
#####	2.8	#####	2.5	6/6/2008	2.7	6/6/2008	2.9
#####	2.9	#####	2.7	6/9/2008	2.7	6/9/2008	2.9
#####	3.1	#####	3.0	#####	2.7	#####	2.9

#####	3.2	#####	3.2	#####	2.7	#####	2.9
#####	3.2	#####	3.2	#####	2.7	#####	3.0
#####	3.2	#####	3.2	#####	2.7	#####	3.0
#####	3.2	#####	3.2	#####	2.8	#####	3.1
#####	3.5	#####	3.4	#####	2.7	#####	3.1
#####	3.8	#####	3.7	#####	2.7	#####	3.0
#####	3.8	#####	3.7	#####	2.7	#####	3.0
#####	3.9	#####	3.7	#####	2.7	#####	3.0
#####	4.1	#####	3.9	#####	2.7	#####	3.0
#####	4.2	#####	4.0	#####	2.7	#####	3.0
#####	4.2	#####	4.0	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.6	#####	3.0
#####	4.5	#####	4.3	7/1/2008	2.7	7/1/2008	3.0
#####	4.8	#####	4.5	7/2/2008	2.7	7/2/2008	3.0
#####	4.8	#####	4.6	7/3/2008	2.7	7/3/2008	3.0
#####	4.8	#####	4.6	7/4/2008	#N/A	7/4/2008	#N/A
#####	4.6	#####	4.5	7/7/2008	2.7	7/7/2008	3.0
#####	4.6	#####	4.4	7/8/2008	2.7	7/8/2008	3.0
#####	4.5	#####	4.3	7/9/2008	2.7	7/9/2008	3.0
#####	4.4	#####	4.2	#####	2.7	#####	3.0
#####	4.1	#####	3.8	#####	2.7	#####	3.0
#####	3.8	#####	3.5	#####	2.7	#####	3.0
#####	3.5	#####	3.3	#####	2.7	#####	3.0
#####	3.5	#####	3.3	#####	2.7	#####	3.0
#####	3.5	#####	3.2	#####	2.7	#####	3.0
#####	3.5	#####	3.2	#####	2.6	#####	3.0
#####	3.5	#####	3.2	#####	2.7	#####	3.0
#####	3.4	#####	3.1	#####	2.7	#####	3.0
#####	3.2	#####	2.9	#####	2.7	#####	3.0
#####	3.0	#####	2.6	#####	2.7	#####	3.0
#####	2.9	#####	2.4	#####	2.7	#####	3.0
#####	2.7	#####	2.2	#####	2.7	#####	3.0
#####	2.5	#####	2.0	#####	2.7	#####	3.0
#####	2.4	#####	1.8	#####	2.7	#####	3.0
#####	2.3	#####	1.6	#####	2.7	#####	3.0
#####	2.2	#####	1.5	8/1/2008	2.6	8/1/2008	3.0
#####	2.2	#####	1.5	8/4/2008	2.6	8/4/2008	3.0
#####	2.1	#####	1.4	8/5/2008	2.6	8/5/2008	3.0
#####	2.1	#####	1.4	8/6/2008	2.7	8/6/2008	3.0
#####	2.2	#####	1.5	8/7/2008	2.6	8/7/2008	3.0
#####	2.2	#####	1.5	8/8/2008	2.6	8/8/2008	3.0
#####	2.2	#####	1.5	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0

#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.7	#####	3.0
#####	2.2	#####	1.8	#####	2.7	#####	3.0
#####	2.2	#####	1.6	9/1/2008	#N/A	9/1/2008	#N/A
#####	2.1	#####	1.4	9/2/2008	2.6	9/2/2008	3.0
#####	2.0	#####	1.2	9/3/2008	2.6	9/3/2008	3.0
#####	1.9	#####	1.0	9/4/2008	2.6	9/4/2008	3.0
#####	1.9	#####	1.0	9/5/2008	2.6	9/5/2008	3.0
#####	1.8	#####	0.9	9/8/2008	2.7	9/8/2008	3.0
#####	1.6	#####	0.6	9/9/2008	2.7	9/9/2008	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	3.2	#####	3.2
#####	1.5	#####	0.5	#####	3.8	#####	3.8
#####	1.4	#####	0.4	#####	6.0	#####	5.0
#####	1.4	#####	0.4	#####	6.0	#####	5.0
1/2/2009	1.4	1/2/2009	0.4	#####	5.0	#####	5.0
1/5/2009	1.4	1/5/2009	0.4	#####	5.3	#####	5.0
1/6/2009	1.4	1/6/2009	0.4	#####	5.3	#####	5.0
1/7/2009	1.4	1/7/2009	0.4	#####	5.5	#####	5.0
1/8/2009	1.4	1/8/2009	0.4	#####	5.5	#####	5.0
1/9/2009	1.3	1/9/2009	0.4	#####	5.5	#####	5.0
#####	1.2	#####	0.3	#####	7.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.5	#####	6.0
#####	1.1	#####	0.4	#####	7.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	#N/A	#####	#N/A
#####	1.2	#####	0.4	#####	5.8	#####	6.0
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.0	#####	5.8
#####	1.2	#####	0.4	#####	4.3	#####	5.0

2/2/2009	1.2	2/2/2009	0.4	#####	4.0	#####	4.5
2/3/2009	1.2	2/3/2009	0.4	#####	3.8	#####	4.5
2/4/2009	1.2	2/4/2009	0.4	#####	3.8	#####	4.5
2/5/2009	1.2	2/5/2009	0.4	#####	3.8	#####	4.5
2/6/2009	1.2	2/6/2009	0.4	#####	3.8	#####	4.5
2/9/2009	1.2	2/9/2009	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	2.8	#####	4.3
#####	1.2	#####	0.5	#####	2.5	#####	4.0
#####	1.2	#####	0.5	#####	2.3	#####	3.3
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	#N/A	#####	#N/A
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	1.8	#####	3.0
3/2/2009	1.3	3/2/2009	0.5	#####	1.8	#####	3.0
3/3/2009	1.3	3/3/2009	0.5	#####	1.8	#####	3.0
3/4/2009	1.3	3/4/2009	0.5	#####	1.8	#####	3.0
3/5/2009	1.3	3/5/2009	0.5	#####	1.9	#####	3.0
3/6/2009	1.3	3/6/2009	0.5	#####	2.0	#####	3.0
3/9/2009	1.3	3/9/2009	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	#N/A	#####	#N/A
#####	1.3	#####	0.6	#####	2.8	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.5	#####	2.6	#####	3.0
#####	1.2	#####	0.5	#####	2.7	#####	3.0
#####	1.2	#####	0.5	#####	2.3	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	2.9
#####	1.2	#####	0.5	#####	1.5	#####	2.6
#####	1.2	#####	0.5	#####	1.3	#####	2.2
#####	1.2	#####	0.5	#####	1.3	#####	2.0
4/1/2009	1.2	4/1/2009	0.5	#####	1.3	#####	2.0
4/2/2009	1.2	4/2/2009	0.5	#####	1.3	#####	2.0
4/3/2009	1.2	4/3/2009	0.5	#####	1.3	#####	2.0
4/6/2009	1.2	4/6/2009	0.5	#####	1.2	#####	2.0
4/7/2009	1.1	4/7/2009	0.5	#####	1.2	#####	2.0



#####	0.6	#####	0.3	3/2/2009	0.8	3/2/2009	1.7
#####	0.6	#####	0.3	3/3/2009	0.9	3/3/2009	1.7
#####	0.6	#####	0.3	3/4/2009	0.8	3/4/2009	1.7
#####	0.6	#####	0.3	3/5/2009	0.8	3/5/2009	1.7
#####	0.6	#####	0.3	3/6/2009	0.8	3/6/2009	1.7
#####	0.6	#####	0.3	3/9/2009	0.9	3/9/2009	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
7/1/2009	0.6	7/1/2009	0.3	#####	1.0	#####	1.7
7/2/2009	0.6	7/2/2009	0.3	#####	1.0	#####	1.7
7/3/2009	0.6	7/3/2009	0.3	#####	1.0	#####	1.7
7/6/2009	0.5	7/6/2009	0.3	#####	1.0	#####	1.7
7/7/2009	0.5	7/7/2009	0.3	#####	1.0	#####	1.6
7/8/2009	0.5	7/8/2009	0.3	#####	1.0	#####	1.6
7/9/2009	0.5	7/9/2009	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.6	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	4/1/2009	1.0	4/1/2009	1.6
#####	0.5	#####	0.3	4/2/2009	1.0	4/2/2009	1.6
#####	0.5	#####	0.3	4/3/2009	1.0	4/3/2009	1.6
#####	0.5	#####	0.3	4/6/2009	1.0	4/6/2009	1.6
#####	0.5	#####	0.3	4/7/2009	1.0	4/7/2009	1.6
#####	0.5	#####	0.3	4/8/2009	1.0	4/8/2009	1.6
#####	0.5	#####	0.3	4/9/2009	0.8	4/9/2009	1.5
#####	0.5	#####	0.3	#####	#N/A	#####	#N/A
#####	0.5	#####	0.3	#####	0.8	#####	1.5
#####	0.5	#####	0.3	#####	1.0	#####	1.5
8/3/2009	0.5	8/3/2009	0.3	#####	1.0	#####	1.5
8/4/2009	0.5	8/4/2009	0.3	#####	1.0	#####	1.5
8/5/2009	0.5	8/5/2009	0.3	#####	1.0	#####	1.5
8/6/2009	0.5	8/6/2009	0.3	#####	1.0	#####	1.5
8/7/2009	0.5	8/7/2009	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	5/1/2009	0.9	5/1/2009	1.4
#####	0.4	#####	0.3	5/4/2009	0.9	5/4/2009	1.4
#####	0.4	#####	0.3	5/5/2009	0.8	5/5/2009	1.4



#####	0.3	#####	0.2	#####	0.6	#####	1.0
#####	0.3	#####	0.2	#####	0.6	#####	1.1
#####	0.3	#####	0.2	#####	0.6	#####	1.0
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.8
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#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	8/3/2009	0.5	8/3/2009	0.8
#####	0.3	#####	0.2	8/4/2009	0.5	8/4/2009	0.8
#####	0.3	#####	0.2	8/5/2009	0.5	8/5/2009	0.8
#####	0.3	#####	0.2	8/6/2009	0.5	8/6/2009	0.8
#####	0.3	#####	0.2	8/7/2009	0.5	8/7/2009	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.2	#####	0.2	9/1/2009	0.5	9/1/2009	0.6
#####	0.2	#####	0.2	9/2/2009	0.5	9/2/2009	0.5
#####	0.3	#####	0.2	9/3/2009	0.5	9/3/2009	0.6
#####	0.3	#####	0.2	9/4/2009	0.5	9/4/2009	0.6
#####	0.3	#####	0.2	9/7/2009	#N/A	9/7/2009	#N/A
#####	0.3	#####	0.2	9/8/2009	0.4	9/8/2009	0.6
#####	0.3	#####	0.2	9/9/2009	0.4	9/9/2009	0.6
1/4/2010	0.3	1/4/2010	0.2	#####	0.4	#####	0.6
1/5/2010	0.3	1/5/2010	0.2	#####	0.4	#####	0.6
1/6/2010	0.3	1/6/2010	0.2	#####	0.4	#####	0.5

















7/6/2011	0.2	7/6/2011	0.2	#####	0.3	#####	0.4
7/7/2011	0.2	7/7/2011	0.2	#####	0.3	#####	0.4
7/8/2011	0.2	7/8/2011	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	3/1/2011	0.3	3/1/2011	0.4
#####	0.2	#####	0.2	3/2/2011	0.3	3/2/2011	0.4
#####	0.2	#####	0.2	3/3/2011	0.3	3/3/2011	0.4
#####	0.2	#####	0.2	3/4/2011	0.3	3/4/2011	0.4
#####	0.3	#####	0.2	3/7/2011	0.3	3/7/2011	0.4
#####	0.3	#####	0.2	3/8/2011	0.3	3/8/2011	0.4
#####	0.3	#####	0.2	3/9/2011	0.3	3/9/2011	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
8/1/2011	0.3	8/1/2011	0.2	#####	0.3	#####	0.4
8/2/2011	0.3	8/2/2011	0.2	#####	0.3	#####	0.4
8/3/2011	0.3	8/3/2011	0.2	#####	0.3	#####	0.4
8/4/2011	0.3	8/4/2011	0.2	#####	0.3	#####	0.4
8/5/2011	0.3	8/5/2011	0.2	#####	0.3	#####	0.4
8/8/2011	0.3	8/8/2011	0.2	#####	0.3	#####	0.4
8/9/2011	0.3	8/9/2011	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	4/1/2011	0.3	4/1/2011	0.4
#####	0.3	#####	0.2	4/4/2011	0.3	4/4/2011	0.4
#####	0.3	#####	0.2	4/5/2011	0.3	4/5/2011	0.4
#####	0.3	#####	0.2	4/6/2011	0.3	4/6/2011	0.4
#####	0.3	#####	0.2	4/7/2011	0.3	4/7/2011	0.4
#####	0.3	#####	0.2	4/8/2011	0.3	4/8/2011	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
9/1/2011	0.3	9/1/2011	0.2	#####	0.3	#####	0.4
9/2/2011	0.3	9/2/2011	0.2	#####	0.3	#####	0.4
9/5/2011	0.3	9/5/2011	0.2	#####	0.3	#####	0.4
9/6/2011	0.3	9/6/2011	0.2	#####	0.3	#####	0.4
9/7/2011	0.3	9/7/2011	0.2	#####	0.3	#####	0.4
9/8/2011	0.3	9/8/2011	0.2	#####	0.3	#####	0.4
9/9/2011	0.3	9/9/2011	0.2	#####	0.3	#####	0.4

















I-26

[London](#)

Reserve System

Underwriter	Security purchased by the Enterprise	LIBOR-Based Interest Rate	CUSIP	Risk Factors language: Underwriters may rip you off by manipulating your reference index	Reviewer
Bank of America	BAFC 2007	1mL + 16	05952DAA1	FALSE	Timothy Lee
Barclays Capital	FHLT 2005	1mL + 26	35729PMA	FALSE	Timothy Lee
		Tied to mortgage rates, which are keyed inter alia to 6m and 12m			
Citibank	CMLTI 200	LIBOR	17312YAB8	FALSE	Timothy Lee
Deutsche Bank	DBALT 200	1mL + 19	25151XAE1	FALSE	Timothy Lee
JPMorgan	JPMAC 200	1mL + 13	46630BAA4	FALSE	Timothy Lee
RBS	OOMLT 200	1mL + 14	68402YAA4	FALSE	Timothy Lee
UBS	MABS 200	1mL + 25	57643LJR8	FALSE	Timothy Lee
HSBC	FFML 2006	1mL + 13	32028PAA3	FALSE	Timothy Lee

## **RE: Emailing: LIBOR proposal.xlsx**

---

**Item ID:** 32052  
**From:** (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Emailing: LIBOR proposal.xlsx  
**Sent:** October 15, 2012 11:10 AM  
**Received:** October 15, 2012 11:10 AM

Thanks.

-----Original Message-----

From: Lee, Timothy [mailto:Timothy.Lee@fhfaoig.gov]

Sent: Monday, October 15, 2012 9:50 AM

To: (b) (6)

Subject: Emailing: LIBOR proposal.xlsx

Hi (b) (6)

Per our conversation. The chart is under "Cum Loss Estimate." Happy to walk you through the concepts behind the revision if you like.

Best,

Tim

Confidentiality Notice: The information in this email and any attachments may be confidential or privileged under applicable law, or otherwise protected from disclosure to anyone other than the intended recipient(s). Any use, distribution, or copying of this email, including any of its contents or attachments by any person other than the intended recipient, or for any purpose other than its intended use, is strictly prohibited. If you believe you received this email in error, please permanently delete it and any attachments, and do not save, copy, disclose, or rely on any part of the information. Please call the OIG at 202-730-4949 if you have any questions or to let us know you received this email in error.

# LIBOR

---

**Item ID:** 32053  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Emerzian, Peter </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e5f50330ff35406f9fb12c708e959aeb-Peter Emerz>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** LIBOR  
**Sent:** October 17, 2012 10:22 AM  
**Received:** October 17, 2012 10:22 AM

[https://sharepoint.fhfaog.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2017.docx](https://sharepoint.fhfaog.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2017.docx) Hi Peter, As discussed. If you can't grab this from the link, let me know. Tim

## **Accepted: LIBOR Draft Action Memo**

---

**Item ID:** 32054  
**Sent:** October 17, 2012 10:22 AM  
**Received:** October 17, 2012 10:22 AM  
**Type:** Calendar Entry

## LIBOR draft

---

**Item ID:** 32055  
**From:** Bloch, David (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** LIBOR draft  
**Sent:** October 17, 2012 10:44 AM  
**Received:** October 17, 2012 10:45 AM

Can you please send me the last version – I understand Alan also worked on it. Thanks. David P. Bloch Director – Division of Mortgage, Investments and Risk Analysis Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Room 3-187 Washington, DC 20024 (b) (6) (telephone) (b) (6)

## LIBOR draft

---

**Item ID:** 32056  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** LIBOR draft  
**Sent:** October 17, 2012 10:59 AM  
**Received:** October 17, 2012 10:59 AM

[https://sharepoint.fhfaog.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2017.docx](https://sharepoint.fhfaog.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%2017.docx) This draft reflects a few minor tweaks I made this morning as well as Alan's and George's edits (you will see we haven't addressed George's explicitly yet). If you need the Excel sheet or the technical appendix, let me know.

## **Accepted: LIBOR Draft Action Memo**

---

**Item ID:** 32057  
**Sent:** October 17, 2012 11:04 AM  
**Received:** October 17, 2012 11:04 AM  
**Type:** Calendar Entry

## FW: LIBOR Draft Action Memo

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**Item ID:** 32058  
**From:** Parker, Richard (b) (5)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Bloch, David (b) (6)  
**Cc:** Grob, George (b) (6)  
**Subject:** FW: LIBOR Draft Action Memo  
**Sent:** October 17, 2012 2:05 PM  
**Received:** October 17, 2012 2:05 PM

Tim and David,

See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we

were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest.

Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and

Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all,

rich

Sent from my Windows Phone

From:

Linick, Steve

Sent:

10/17/2012 1:04 PM

To:

Parker, Richard

Cc:

(b) (6); Seide, David

Subject:

FW: LIBOR Draft Action Memo

Rich,

Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx

From: (b) (6)

Sent: Wednesday, October 17, 2012 12:48 PM

To: Linick, Steve; Seide, David

Subject: RE: LIBOR Draft Action Memo

Steve,

Enclosed please find my comments. I had no problems with George's comments.

(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

Let me know if you need anything else.

(b) (6)

From: Linick, Steve

Sent: Tuesday, October 16, 2012 5:16 PM

To: Seide, David; (b) (6)

Subject: FW: LIBOR Draft Action Memo

Can u give me your redline comments. Tx

Sent from my Windows Phone

From:

Parker, Richard

Sent:

10/12/2012 3:46 PM

To:

Linick, Steve

Cc:

DiSanto, Emilia

Subject:

LIBOR Draft Action Memo

Steve,

Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward.

All in all, (b) (5)

Rich

Richard Parker

Director, Policy, Oversight & Review

Office of the Inspector General

Federal Housing Finance Agency

400 7 th Street, SW

Washington, D.C. 20024

Tel: (b) (6)

Cell (b) (6)

**Attachment #1**

**LIBOR action memo Oct 12.docx**

**Original view**

8 pages (displayed on pages 4 to 11)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 12, 2012

(b) (5)

- 
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)" September 28, 2012
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"
- <sup>4</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)" August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\) based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[3-Month London Interbank Offered Rate \(LIBOR\) based on U.S. Dollar \(USD3MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>14</sup> Federal Reserve Bank of St. Louis, "[3-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>15</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>16</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)" April 30, 2012, pp. 23-31.
- <sup>17</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.
- <sup>18</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2
- <sup>19</sup> Bloomberg L.P. league table of lead managers for US dollar, US issuer floating rate ABS/MBS for calendar years 2009 and 2010.
- <sup>20</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)" April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

**Attachment #2**

**Appendix to LIBOR analysis.docx**

**Original view**

3 pages (displayed on pages 13 to 15)

(b) (5)

(b) (5)

(b) (5)

# RE: LIBOR Draft Action Memo

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**Item ID:** 32059  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Cc:** Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>, (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ee404ea9fa5044ef9bd01bdfeb014378-(b) (6)>  
**Subject:** RE: LIBOR Draft Action Memo  
**Sent:** October 17, 2012 3:05 PM  
**Received:** October 17, 2012 3:05 PM

Hi Rich, I took a look at the comments. My responses are as follows: - (b) (5)

[REDACTED]

Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on

Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments. (b) (5)

[REDACTED]

[REDACTED] Let me know if you need anything else. (b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David (b) (6) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

[REDACTED]

[REDACTED] Rich Richard Parker  
Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street,  
SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6)

## FW: LIBOR Draft Action Memo

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Item ID: 32060  
From: Bloch, David (b) (6)  
To: Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
Subject: FW: LIBOR Draft Action Memo  
Sent: October 17, 2012 3:08 PM  
Received: October 17, 2012 3:08 PM

Masterful. From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:05 PM To: Parker, Richard; Bloch, David Cc: Grob, George; (b) (6) Subject: RE: LIBOR Draft Action Memo Hi Rich, I took a look at the comments. My responses are as follows: (b) (5)

[REDACTED]

[REDACTED]. Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David

Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments. (b) (5)

(b) (6) Let me know if you need anything else. (b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David; (b) (6) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

Rich Richard Parker Director,  
Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW  
Washington, D.C. 20024 Tel: (b) (5) Cell: (b) (6)

# FW: LIBOR Draft Action Memo

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**Item ID:** 32061  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Rhinesmith, Alan </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=98d654fcd31f48f7887a69bf4cc5b12d-Alan Rhines>  
**Subject:** FW: LIBOR Draft Action Memo  
**Sent:** October 17, 2012 3:16 PM  
**Received:** October 17, 2012 3:16 PM

Fyi tim From: Bloch, David Sent: Wednesday, October 17, 2012 3:08 PM To: Lee, Timothy Subject: FW: LIBOR Draft Action Memo Masterful. From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:05 PM To: Parker, Richard; Bloch, David Cc: Grob, George; (b) (6) Subject: RE: LIBOR Draft Action Memo Hi Rich, I took a look at the comments. My responses are as follows: - (b) (5)

[REDACTED]

[REDACTED] Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike

and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments. (b) (5)

[REDACTED]

[REDACTED]. Let me know if you need anything else. (b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David; (b) (6) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

[REDACTED]

[REDACTED] Rich Richard Parker  
Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street,  
SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6)

# RE: LIBOR Draft Action Memo

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Item ID: 32062  
From: Rhinesmith, Alan (b) (6)  
To: Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
Subject: RE: LIBOR Draft Action Memo  
Sent: October 17, 2012 3:31 PM  
Received: October 17, 2012 3:31 PM

Thanks for letting me know the state of play. From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:16 PM To: Rhinesmith, Alan Subject: FW: LIBOR Draft Action Memo Fyi tim From: Bloch, David Sent: Wednesday, October 17, 2012 3:08 PM To: Lee, Timothy Subject: FW: LIBOR Draft Action Memo Masterful. From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:05 PM To: Parker, Richard; Bloch, David Cc: Grob, George; (b) (6) Subject: RE: LIBOR Draft Action Memo Hi Rich, I took a look at the comments. My responses are as follows: (b) (5)

[REDACTED]

[REDACTED] Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for

that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments. (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Let me know if you need anything else.

(b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David; (b) (6) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

[REDACTED]

[REDACTED] Rich Richard Parker Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6)

# Je m'accuse

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Item ID: 32063  
From: [REDACTED] (b) (6)  
To: Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard [REDACTED] (b) (6)  
Subject: Je m'accuse  
Sent: October 17, 2012 4:09 PM  
Received: October 17, 2012 4:09 PM

My apologies Tim. It's a good letter. Steve asked me to review it so I tried to point out potential weaknesses. I apologize for not choosing my words better. To tell you the truth, I'm not sure Steve has even read my comments. Don't send me to Devil's Island for it! J [REDACTED] (b) (5)

[REDACTED]

[REDACTED] (b) (6) From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:05 PM To: Parker, Richard; Bloch, David Cc: Grob, George; [REDACTED] (b) (6) Subject: RE: LIBOR Draft Action Memo Hi Rich, I took a look at the comments. My responses are as follows: -

[REDACTED] (b) (5)

[REDACTED] Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details [REDACTED] (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit

for purpose.” In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim  
From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George  
Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address (b) (6) and David’s comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George’s comments. (b) (5)

[REDACTED]

[REDACTED]. Let me know if you need anything else.  
(b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David; (b) (6) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

[REDACTED]

[REDACTED] Rich Richard Parker Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6)

## RE: LIBOR Draft Action Memo

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**Item ID:** 32064  
**From:** Grob, George (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
Bloch, David (b) (6)  
**Cc:** (b) (6)  
**Subject:** RE: LIBOR Draft Action Memo  
**Sent:** October 17, 2012 4:21 PM  
**Received:** October 17, 2012 4:21 PM

Thank you, Tim. From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:05 PM To: Parker, Richard; Bloch, David  
Cc: Grob, George; (b) (6) Subject: RE: LIBOR Draft Action Memo Hi Rich, I took a look at the comments. My responses are as follows: (b) (5)

[REDACTED]

[REDACTED] Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my

Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address Bob's and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments. (b) (5)

(b) (5) Let me know if you need anything else (b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David; (b) (4) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

(b) (5) Rich Richard Parker Director,  
Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW  
Washington, D.C. 20024 Tel (b) (5) Cell: (b) (6)

## RE: Je m'accuse

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**Item ID:** 32066  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ee404ea9fa5044ef9bd01bdfef014378-(b) (6)>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Rhinesmith, Alan </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=98d654fcd31f48f7887a69bf4cc5b12d-Alan Rhines>  
**Subject:** RE: Je m'accuse  
**Sent:** October 17, 2012 4:29 PM  
**Received:** October 17, 2012 4:29 PM

Hi (b) (6), Many thanks for your kind words. As for the graphics, I worked up an area chart for cumulative losses, as well as a bar chart for quarterly losses. Remember in each case, we begin at 4Q08, when conservatorship started. As it happens, (b) (5)

(b) (5) I'll go ahead and also make the change from line chart to area chart in the memo. However, we can still discuss as a group if warranted. Tim From (b) (6) Sent: Wednesday, October 17, 2012 4:10 PM To: Lee, Timothy; Parker, Richard Subject: Je m'accuse My apologies Tim. It's a good letter. Steve asked me to review it so I tried to point out potential weaknesses. I apologize for not choosing my words better. To tell you the truth, I'm not sure Steve has even read my comments. Don't send me to Devil's Island for it! J (b) (5)

(b) (6) From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:05 PM To: Parker, Richard; Bloch, David Cc: Grob, George; Hinkley, Robert Subject: RE: LIBOR Draft Action Memo Hi Rich, I took a look at the comments. My responses are as follows: (b) (5)

(b) (5)

[REDACTED]. Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments (b) (5)

[REDACTED] Let me know if you need anything else. (b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David; (b) (6) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

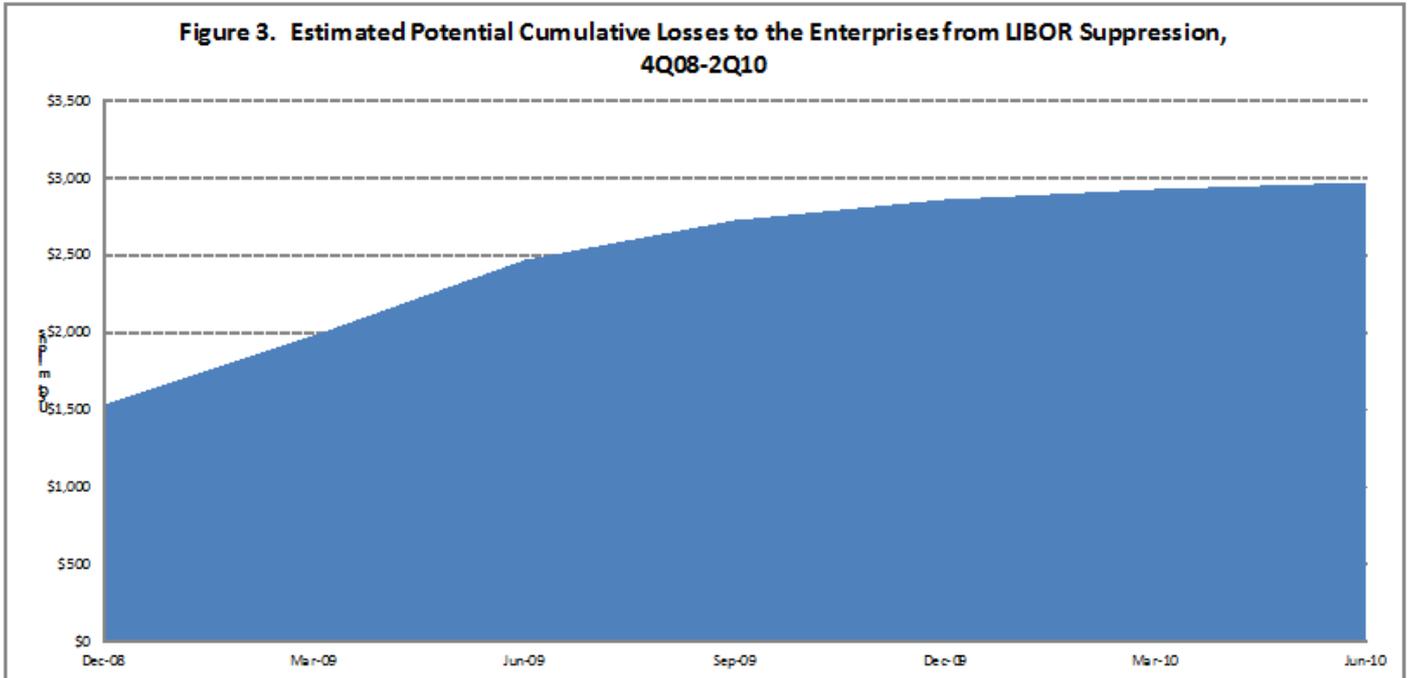
[REDACTED]. Rich Richard Parker  
Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street,  
SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6)

**Attachment #1**  
**image001.wmz**

Attachment #2

image002.png

Image

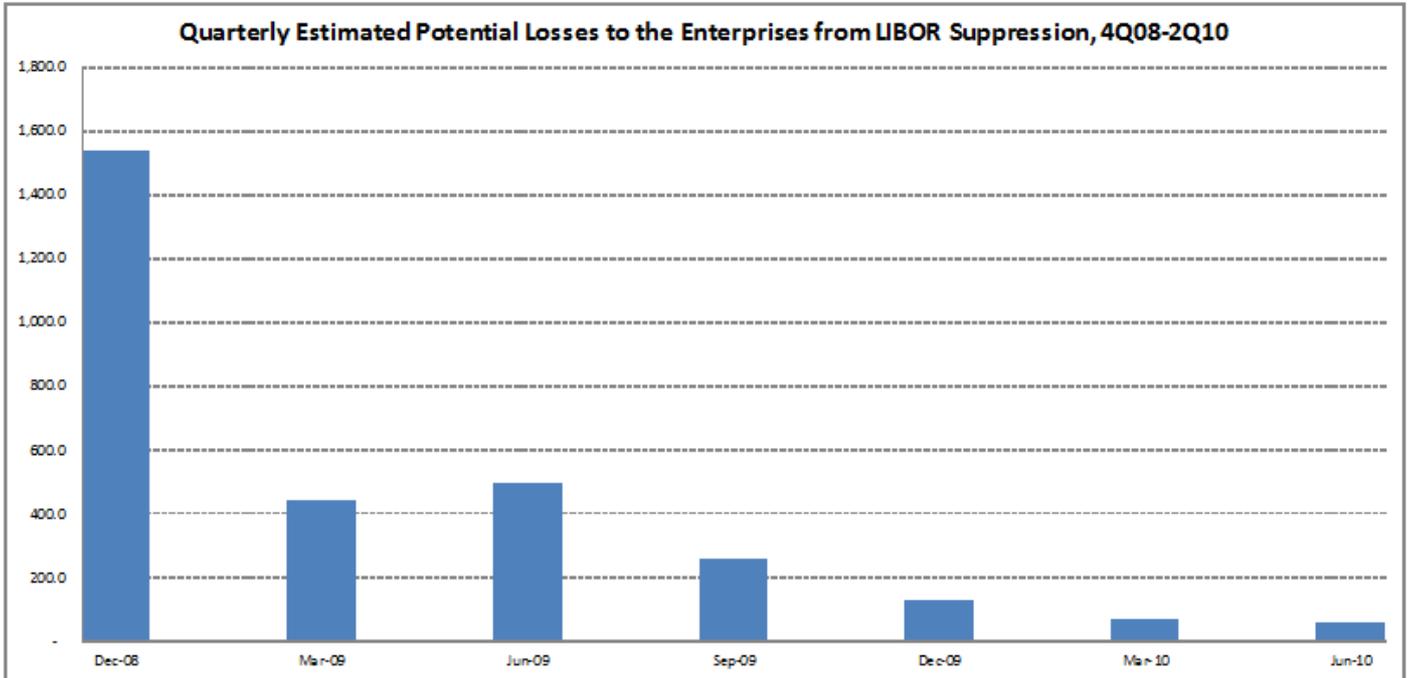


**Attachment #3**  
**image003.wmz**

# Attachment #4

image004.png

Image



**Attachment #5**

**oledata.mso**



(b) (5)

Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: Hinkley, Robert; Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments. (b) (5)

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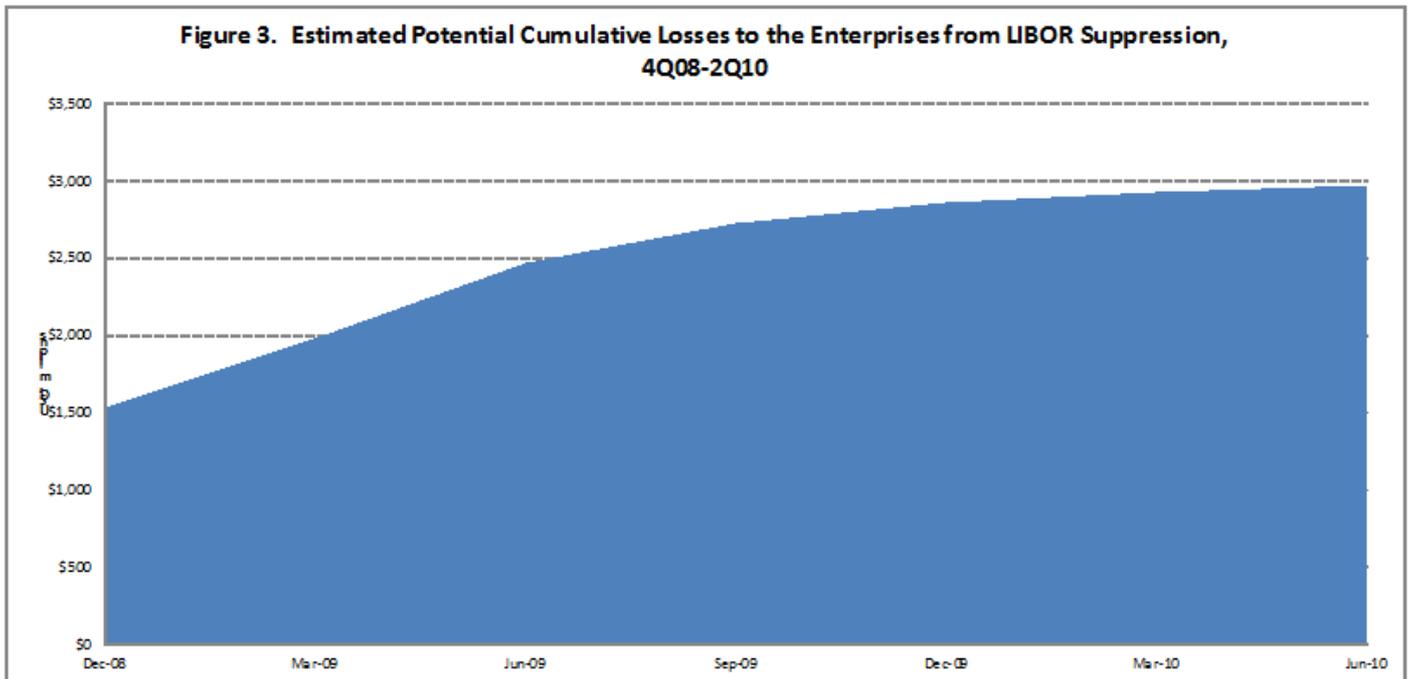
. Rich Richard Parker  
Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street,  
SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6)

**Attachment #1**  
**oledata.mso**

## Attachment #2

image005.png

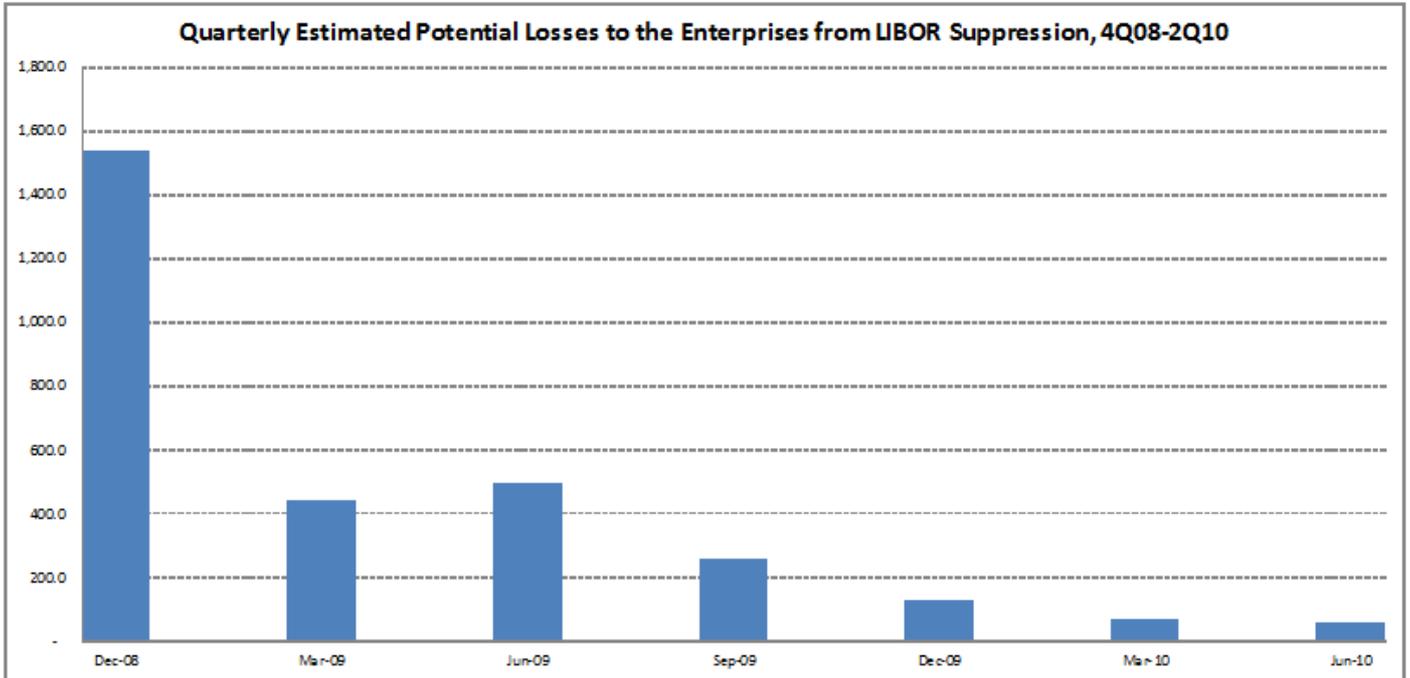
Image



### Attachment #3

image006.png

Image





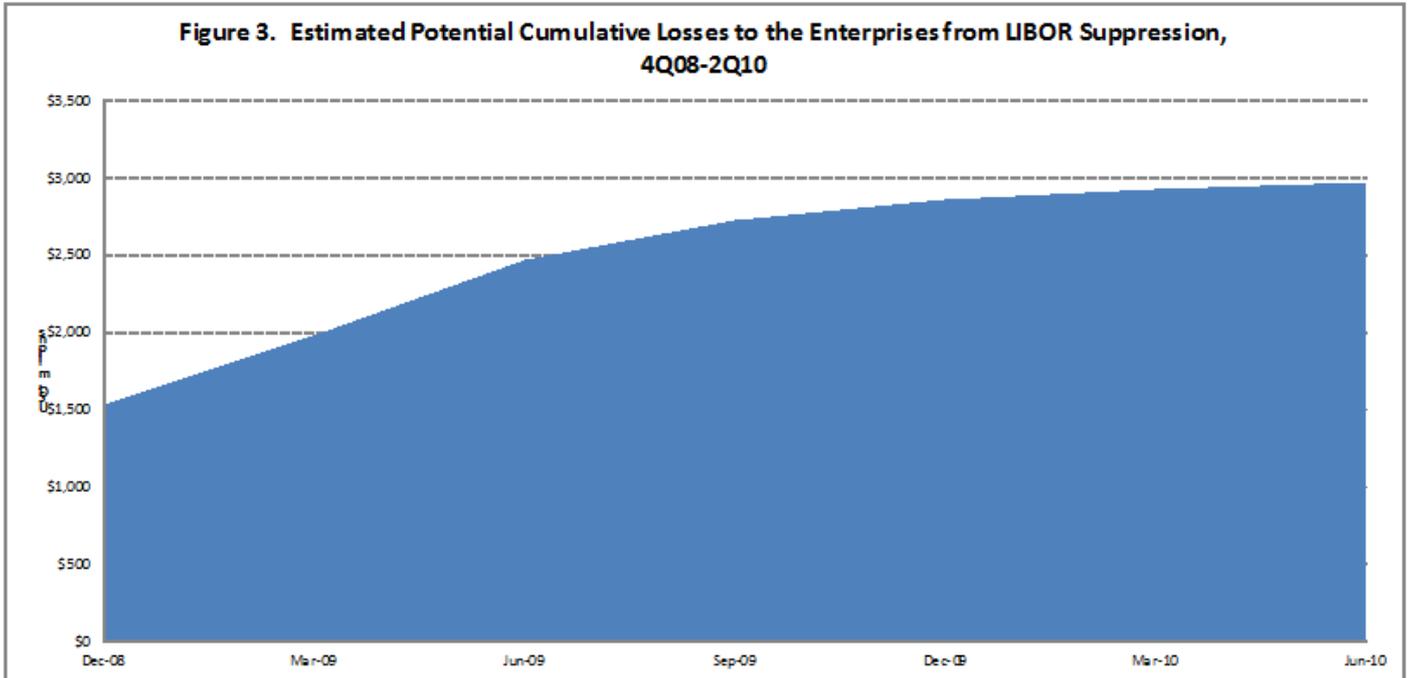
(b) (5)

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Rich Richard Parker  
Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street,  
SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6)

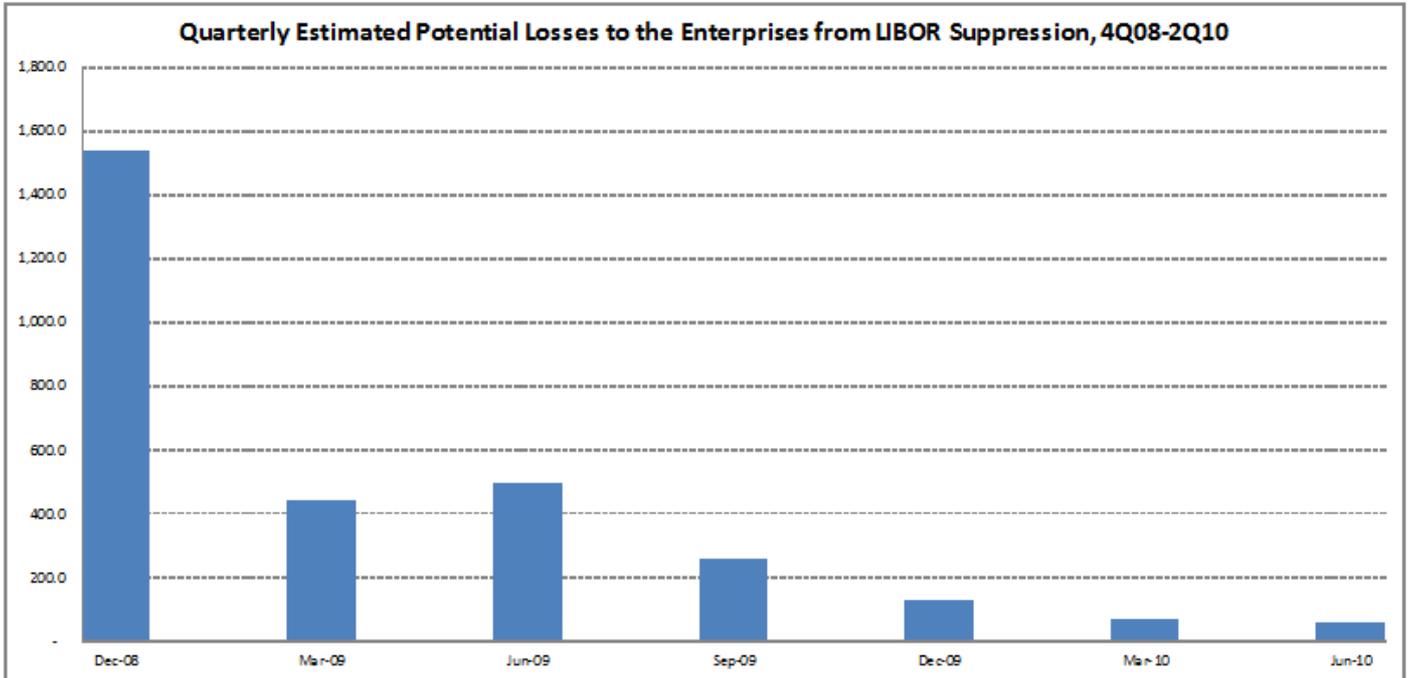
**Attachment #1**  
**image001.png**  
**Image**



## Attachment #2

image002.png

Image



## **LIBOR: Talking points for tomorrow**

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**Item ID:** 32079  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** LIBOR: Talking points for tomorrow  
**Sent:** October 18, 2012 1:04 PM  
**Received:** October 18, 2012 1:04 PM

Hi Old Salt, Let me know what you think. I am assuming that when we sit down, Steve will already be familiar with the contents of the memo. Tim Â-

(b) (5)

----- Timothy Lee Senior Policy Advisor, FHFA-OIG  
202-730-2821

# RE: LIBOR: Talking points for tomorrow

---

**Item ID:** 32082  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Grob, George (b) (6), Bloch, David (b) (6)  
**Subject:** RE: LIBOR: Talking points for tomorrow  
**Sent:** October 18, 2012 1:22 PM  
**Received:** October 18, 2012 1:22 PM

Tim, Great work. Note that Steve is already on board. He just wants to know that (b) (6) comments have been addressed/resolved, and the (b) (6) understands the resolution and agrees. To that end it would be nice to have a chart (half page) that, from left to right, lays-out the comment and the resolution (which can be anything from "done" to "great suggestion but is beyond the scope of this report.") Can you do this? Rich  
From: Lee, Timothy Sent: Thursday, October 18, 2012 1:04 PM To: Parker, Richard Cc: Grob, George; Bloch, David Subject: LIBOR: Talking points for tomorrow  
Hi Old Salt, Let me know what you think. I am assuming that when we sit down, Steve will already be familiar with the contents of the memo. Tim (b) (5)

[REDACTED]

----- Timothy Lee Senior Policy Advisor, FHFA-OIG  
202-730-2821

## **RE: LIBOR: Talking points for tomorrow**

---

**Item ID:** 32086  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>, Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** RE: LIBOR: Talking points for tomorrow  
**Sent:** October 18, 2012 1:23 PM  
**Received:** October 18, 2012 1:23 PM

As they say in the Army, aye aye From: Parker, Richard Sent: Thursday, October 18, 2012 1:22 PM To: Lee, Timothy Cc: Grob, George; Bloch, David Subject: RE: LIBOR: Talking points for tomorrow Tim, Great work. Note that Steve is already on board. He just wants to know that (b) (6) comments have been addressed/resolved, and that (b) (6) understands the resolution and agrees. To that end it would be nice to have a chart (half page) that, from left to right, lays-out the comment and the resolution (which can be anything from "done" to "great suggestion but is beyond the scope of this report.") Can you do this? Rich From: Lee, Timothy Sent: Thursday, October 18, 2012 1:04 PM To: Parker, Richard Cc: Grob, George; Bloch, David Subject: LIBOR: Talking points for tomorrow Hi Old Salt, Let me know what you think. I am assuming that when we sit down, Steve will already be familiar with the contents of the memo.

Tim Â· (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## LIBOR memo comments

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**Item ID:** 32087  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ee404ea9fa5044ef9bd01bdfeb014378-(b) (6)>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** LIBOR memo comments  
**Sent:** October 18, 2012 2:46 PM  
**Received:** October 18, 2012 2:46 PM

Hi (b) (6), Old Salt asked me to put together a table listing out your comments and our responses. Could you take a look and confirm that both are summarized fairly with respect to the current memo? Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR Comments Table.docx**

**Original view**

1 page

Response to David's and (b) (6) comments on LIBOR memo draft:

(b) (5)

## **RE: LIBOR memo comments**

---

**Item ID:** 32088  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: LIBOR memo comments  
**Sent:** October 18, 2012 3:09 PM  
**Received:** October 18, 2012 3:09 PM

You rock. From: Lee, Timothy Sent: Thursday, October 18, 2012 2:47 PM To: (b) (6) Cc: Parker, Richard  
Subject: LIBOR memo comments Hi (b) (6), Old Salt asked me to put together a table listing out your comments and our responses. Could you take a look and confirm that both are summarized fairly with respect to the current memo?  
Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **RE: LIBOR memo comments**

---

**Item ID:** 32089  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** RE: LIBOR memo comments  
**Sent:** October 18, 2012 3:12 PM  
**Received:** October 18, 2012 3:12 PM

Thanks. I almost put in a footnote that (b) (6), and therefore I would not need to fear for my bodily integrity if in fact she did catch me in a suspicious setting. But then I thought better of it. From: Parker, Richard Sent: Thursday, October 18, 2012 3:09 PM To: Lee, Timothy Subject: RE: LIBOR memo comments You rock. From: Lee, Timothy Sent: Thursday, October 18, 2012 2:47 PM To: (b) (6) Cc: Parker, Richard Subject: LIBOR memo comments Hi (b) (5), Old Salt asked me to put together a table listing out your comments and our responses. Could you take a look and confirm that both are summarized fairly with respect to the current memo? Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo comments

---

**Item ID:** 32091  
**From:** (b) (6) >  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Parker, Richard (b) (6)  
**Subject:** RE: LIBOR memo comments  
**Sent:** October 18, 2012 3:48 PM  
**Received:** October 18, 2012 3:48 PM

Tim, I'm not sure your wife wouldn't get a divorce, but other than that I'm ok with your responses and the changes you made. Thanks. (b) (6) (b) (6) Attorney Advisor FHFA Office of Inspector General 400 7 th Street, SW Washington, DC 20024 Tel: (b) (6) Mob: (b) (6) From: Lee, Timothy Sent: Thursday, October 18, 2012 2:47 PM To (b) (6) Cc: Parker, Richard Subject: LIBOR memo comments Hi (b) (6), Old Salt asked me to put together a table listing out your comments and our responses. Could you take a look and confirm that both are summarized fairly with respect to the current memo? Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo comments

---

**Item ID:** 32092  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ee404ea9fa5044ef9bd01bdfeb014378-(b) (6)>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** RE: LIBOR memo comments  
**Sent:** October 18, 2012 3:49 PM  
**Received:** October 18, 2012 3:49 PM

Implicit in that comment, of course, is a hearty confirmation that we are onto something with this whole project! From: (b) (6) Sent: Thursday, October 18, 2012 3:48 PM To: Lee, Timothy Cc: Parker, Richard Subject: RE: LIBOR memo comments Tim, I'm not sure your wife wouldn't get a divorce, but other than that I'm ok with your responses and the changes you made. Thanks. (b) (6) Attorney Advisor FHFA Office of Inspector General 400 7 th Street, SW Washington, DC 20024 Tel: (b) (6) Mob: (b) (6) From: Lee, Timothy Sent: Thursday, October 18, 2012 2:47 PM To: (b) (6) Cc: Parker, Richard Subject: LIBOR memo comments Hi (b) (6), Old Salt asked me to put together a table listing out your comments and our responses. Could you take a look and confirm that both are summarized fairly with respect to the current memo? Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo comments

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**Item ID:** 32102  
**From:** (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: LIBOR memo comments  
**Sent:** October 18, 2012 3:54 PM  
**Received:** October 18, 2012 3:54 PM

Without a doubt. I think I said before you are to be congratulated for coming up with it. Well done. (b) (6) From: Lee, Timothy Sent: Thursday, October 18, 2012 3:49 PM To: (b) (6) Cc: Parker, Richard Subject: RE: LIBOR memo comments Implicit in that comment, of course, is a hearty confirmation that we are onto something with this whole project! From: (b) (6) Sent: Thursday, October 18, 2012 3:48 PM To: Lee, Timothy Cc: Parker, Richard Subject: RE: LIBOR memo comments Tim, I'm not sure your wife wouldn't get a divorce, but other than that I'm ok with your responses and the changes you made. Thanks. (b) (6) Attorney Advisor FHFA Office of Inspector General 400 7 th Street, SW Washington, DC 20024 Tel: (b) (6) Mob: (b) (6) From: Lee, Timothy Sent: Thursday, October 18, 2012 2:47 PM To: (b) (6) Cc: Parker, Richard Subject: LIBOR memo comments Hi (b) (6), Old Salt asked me to put together a table listing out your comments and our responses. Could you take a look and confirm that both are summarized fairly with respect to the current memo? Thanks, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **LIBOR Comments Table.docx**

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**Item ID:** 32101  
**From:** Parker, Richard (b) (6)  
**To:** Linick, Steve (b) (6)  
**Cc:** Lee, Timothy <Timothy.Lee@fhfaig.gov>, (b) (6)  
**Subject:** LIBOR Comments Table.docx  
**Sent:** October 18, 2012 4:41 PM  
**Received:** October 18, 2012 4:41 PM

Steve, This is the matrix of (b) (6) comments and our resolution of them. (b) (6) has signed-off on this. I will get you the most recent iteration of the memo shortly. Rich Richard Parker Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, D.C. 20024 Tel: (b) (6)  
Cell: (b) (6)

**Attachment #1**

**LIBOR Comments Table.docx**

**Original view**

1 page

Response to David's and (b) (6) comments on LIBOR memo draft:

(b) (5)

## FW: Libor

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**Item ID:** 32099  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** FW: Libor  
**Sent:** October 18, 2012 4:42 PM  
**Received:** October 18, 2012 4:42 PM

If I hunt it in SharePoint, will I find it? From: Linick, Steve Sent: Thursday, October 18, 2012 4:25 PM To: Parker, Richard Cc: (b) (6) t Subject: Libor Rich, can I get the latest version of the Libor memo with (b) (6) additions. Also ,please include him in the meeting tmrw. tx

## FW: Je m'accuse

---

**Item ID:** 32103  
**From:** Lee, Timothy </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9770D766B6642C4AC0F9F116D0B180D-TIMOTHY LEE>  
**To:** Parker, Richard </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** FW: Je m'accuse  
**Sent:** October 18, 2012 4:46 PM  
**Received:** October 18, 2012 4:46 PM

Hi Old Salt,

Please note that edits and comments remain visible. I can scrub them this evening.

Sent from my Windows Phone

**From:**  
Lee, Timothy  
**Sent:**  
10/18/2012 9:55  
**To:**

(b) (6)

**Subject:**

RE: Je m'accuse

For you, the full package.

Memo

Appendix

Excel file

**From:** (b) (6)  
**Sent:** Thursday, October 18, 2012 9:51 AM  
**To:** Lee, Timothy  
**Subject:** FW: Je m'accuse

Can I get the revised memo? Thanks. Bob

**From:** Lee, Timothy

**Sent:** Wednesday, October 17, 2012 4:30 PM

**To:** (b) (6)

**Cc:** Parker, Richard; Grob, George; Bloch, David; Rhinesmith, Alan

**Subject:** RE: Je m'accuse

Hi (b) (6)

Many thanks for your kind words. As for the graphics, I worked up an area chart for cumulative losses, as well as a bar chart for quarterly losses. Remember in each case, we begin at 4Q08, when conservatorship started. As it happens (b) (5)

Tim

**From:** Hinkley, Robert

**Sent:** Wednesday, October 17, 2012 4:10 PM

To: Lee, Timothy; Parker, Richard

Subject: Je m'accuse

My apologies Tim.

It's a good letter. Steve asked me to review it so I tried to point out potential weaknesses. I apologize for not choosing my words better. To tell you the truth, I'm not sure Steve has even read my comments.

Don't send me to Devil's Island for it! J

(b) (5)

(b) (6)

From: Lee, Timothy

Sent: Wednesday, October 17, 2012 3:05 PM

To: Parker, Richard; Bloch, David

Cc: Grob, George; (b) (6)

Subject: RE: LIBOR Draft Action Memo

Hi Rich,

I took a look at the comments. My responses are as follows:

Â

(b) (5)

(b) (5)

Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly.

The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the

Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number

so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "œfit for purpose."

In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve.

Tim

From: Parker, Richard

Sent: Wednesday, October 17, 2012 2:05 PM

To: Lee, Timothy; Bloch, David

Cc: Grob, George

Subject: FW: LIBOR Draft Action Memo

Tim and David,

See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we

were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest.

Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvoke the four of us (Grob, Bloch, Lee, and

Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all,

rich

Sent from my Windows Phone

From:

Linick, Steve

Sent:

10/17/2012 1:04 PM

To:

Parker, Richard

Cc:

(b) (6); Seide, David

Subject:

FW: LIBOR Draft Action Memo

Rich,

Before you schedule a briefing with me, please have your team address (b) (6) and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx

From: (b) (6)

Sent: Wednesday, October 17, 2012 12:48 PM

To: Linick, Steve; Seide, David

Subject: RE: LIBOR Draft Action Memo

Steve,

Enclosed please find my comments. I had no problems with George's comments.

(b) (5)

Let me know if you need anything else.

(b) (6)

From: Linick, Steve

Sent: Tuesday, October 16, 2012 5:16 PM

To: Seide, David; (b) (6)

Subject: FW: LIBOR Draft Action Memo

Can u give me your redline comments. Tx

Sent from my Windows Phone

From:

Parker, Richard

Sent:

10/12/2012 3:46 PM

To:

Linick, Steve

Cc:

DiSanto, Emilia

Subject:

LIBOR Draft Action Memo

Steve,

Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward.

All in all, (b) (5)

(b) (5)

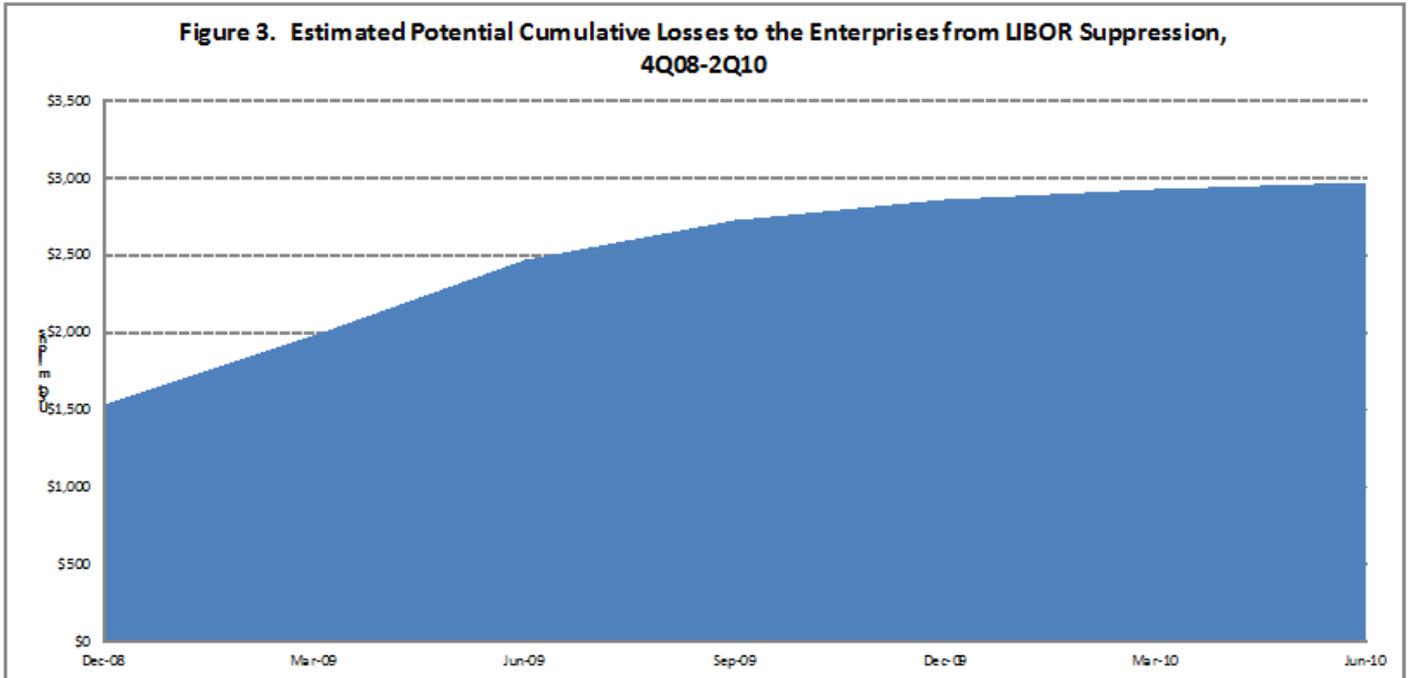
Rich

Richard Parker

Director, Policy, Oversight & Review

Office of the Inspector General  
Federal Housing Finance Agency  
400 7 th Street, SW  
Washington, D.C. 20024  
Tel: (b) (6)  
Cell: (b) (6)

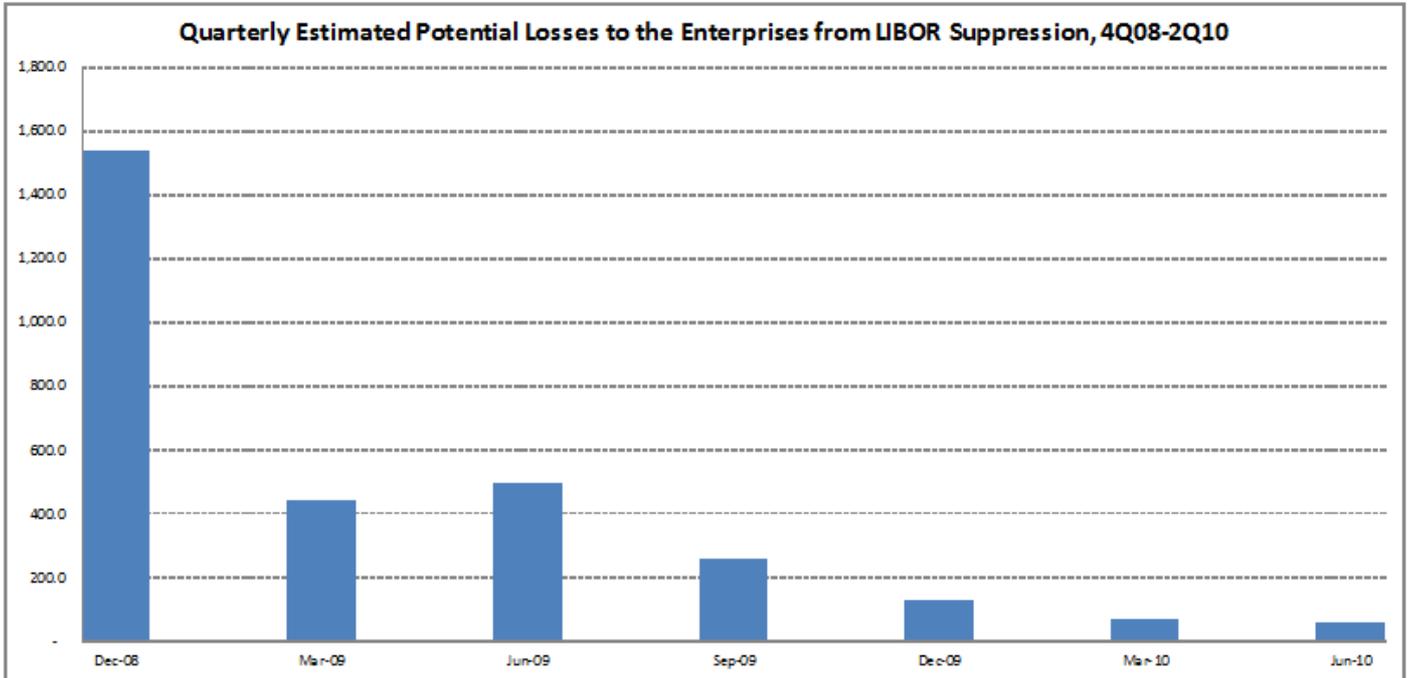
**Attachment #1**  
**image001.png**  
**Image**



## Attachment #2

image002.png

Image



## RE: Je m'accuse

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**Item ID:** 32094  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Je m'accuse  
**Sent:** October 18, 2012 4:51 PM  
**Received:** October 18, 2012 4:52 PM

If you would . . . please . . . Tx, R From: Lee, Timothy Sent: Thursday, October 18, 2012 4:46 PM To: Parker, Richard Subject: FW: Je m'accuse Hi Old Salt, Please note that edits and comments remain visible. I can scrub them this evening. Sent from my Windows Phone From: Lee, Timothy Sent: 10/18/2012 9:55 To: (b) (6) Subject: RE: Je m'accuse For you, the full package. Memo Appendix Excel file From: (b) (6) Sent: Thursday, October 18, 2012 9:51 AM To: Lee, Timothy Subject: FW: Je m'accuse Can I get the revised memo? Thanks. (b) (6) From: Lee, Timothy Sent: Wednesday, October 17, 2012 4:30 PM To: (b) (6) Cc: Parker, Richard; Grob, George; Bloch, David; Rhinesmith, Alan Subject: RE: Je m'accuse Hi (b) (6) Many thanks for your kind words. As for the graphics, I worked up an area chart for cumulative losses, as well as a bar chart for quarterly losses. Remember in each case, we begin at 4Q08, when conservatorship started. (b) (5)

" I'll go ahead and also make the change from line chart to area chart in the memo. However, we can still discuss as a group if warranted. Tim From: (b) (6) Sent: Wednesday, October 17, 2012 4:10 PM To: Lee, Timothy; Parker, Richard Subject: Je m'accuse My apologies Tim. It's a good letter. Steve asked me to review it so I tried to point out potential weaknesses. I apologize for not choosing my words better. To tell you the truth, I'm not sure Steve has even read my comments. Don't send me to Devil's Island for it! J (b) (5)

(b) (6) From: Lee, Timothy Sent: Wednesday, October 17, 2012 3:05 PM To: Parker, Richard; Bloch, David Cc: Grob, George; (b) (6) Subject: RE: LIBOR Draft Action Memo Hi Rich, I took a look at the comments. My responses are as follows: (b) (5)

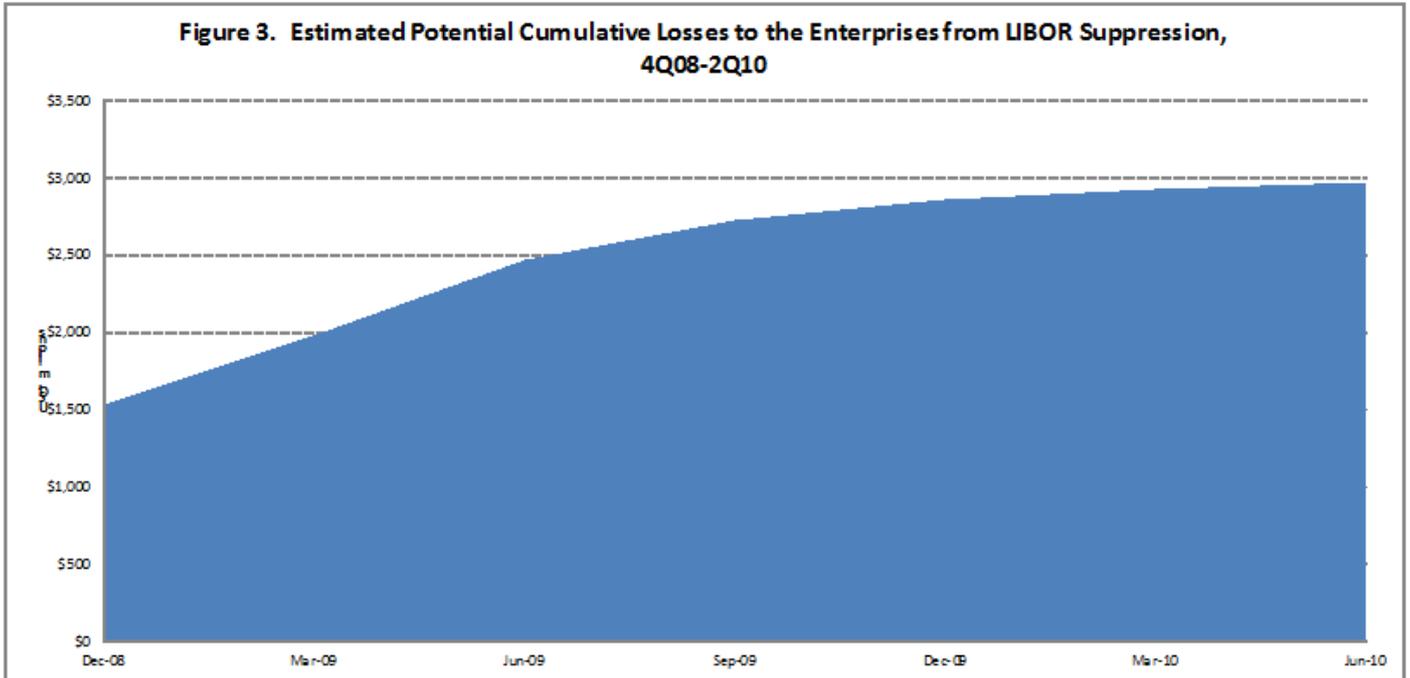
(b) (5)

Per all of my previous conversations, the document is deliberately written simply, with minimal emphasis on numerical details, in order to appeal to readers who are not financial professionals. Moreover it has been kept short. However, that means it must be carefully read in order to be evaluated properly. The emphasis on user-friendliness means that some of the details (b) (6) seeks are not included in the draft. I will see that he receives the Excel sheet so that he can satisfy himself at his leisure as to how I arrived at the answers provided. As stated before, I am perfectly content to (a) publish the relevant portions of the Excel sheet for public scrutiny, and/or (b) publish my phone number so that the numbers geeks can call me up personally. Based on public and covert sources, I am highly confident that this paper is, as the British say, "fit for purpose." In light of that, please let me know if we still need an in-person conversation; I am in the office tomorrow. My view of matters is that nothing prevents us from going ahead with the Friday morning meeting with Steve. Tim From: Parker, Richard Sent: Wednesday, October 17, 2012 2:05 PM To: Lee, Timothy; Bloch, David Cc: Grob, George Subject: FW: LIBOR Draft Action Memo Tim and David, See the message one under. Steve had (b) (6) and David read the memo for him. Their questions are noted. Steve wants them answered or accounted for before he will go forward. Can you look this over and meet with George and me on Friday @ 1000 hrs when we were going to meet and brief Steve? That time slot is already tied up on all of our calendars. Pls advise soonest. Skipper, pls have (b) (6) cancel the 1000 hrs with Steve, Em, Peter, Simon, and Mike and then reinvite the four of us (Grob, Bloch, Lee, and Parker) for that time. I think that it would be best if you ran your replies by George and me before you both brief Steve so pls plan to do that on Friday morning. Tx to all, rich Sent from my Windows Phone From: Linick, Steve Sent: 10/17/2012 1:04 PM To: Parker, Richard Cc: (b) (6); Seide, David Subject: FW: LIBOR Draft Action Memo Rich, Before you schedule a briefing with me, please have your team address Bob's and David's comments and revise accordingly. This should really be a memo from your team to me, which I will attach to a cover letter to demarco. tx From: (b) (6) Sent: Wednesday, October 17, 2012 12:48 PM To: Linick, Steve; Seide, David Subject: RE: LIBOR Draft Action Memo Steve, Enclosed please find my comments. I had no problems with George's comments. (b) (5)

Let me know if you need anything else. (b) (6) From: Linick, Steve Sent: Tuesday, October 16, 2012 5:16 PM To: Seide, David; (b) (6) Subject: FW: LIBOR Draft Action Memo Can u give me your redline comments. Tx Sent from my Windows Phone From: Parker, Richard Sent: 10/12/2012 3:46 PM To: Linick, Steve Cc: DiSanto, Emilia Subject: LIBOR Draft Action Memo Steve, Here is the working draft of the LIBOR action memo. I will be polishing it over the weekend but this is the format and content we have talked about and vetted around the office over the last two weeks. I will incorporate the appendix into the body of the memo as we go forward. All in all, (b) (5)

Rich Richard Parker Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (5)

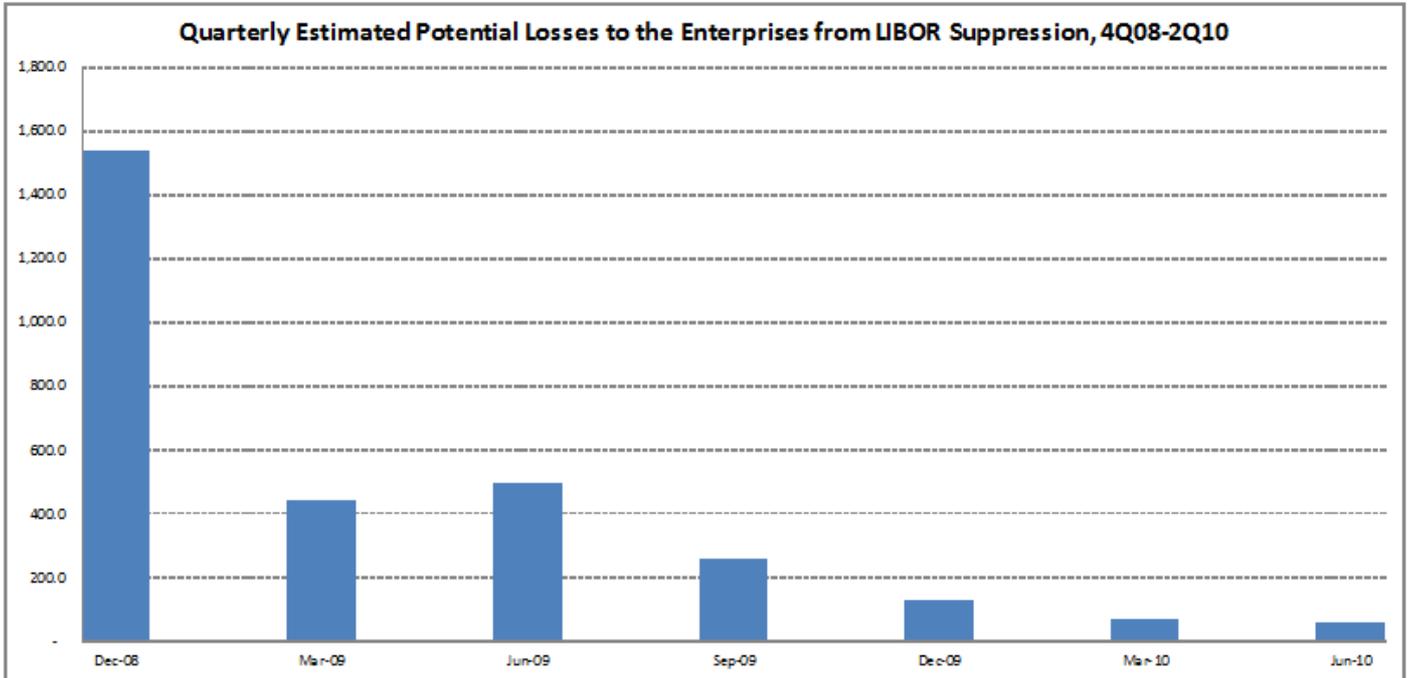
**Attachment #1**  
**image001.png**  
**Image**



## Attachment #2

image002.png

Image



## LIBOR Memo

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**Item ID:** 32093  
**From:** Parker, Richard (b) (6)  
**To:** Linick, Steve (b) (6)  
**Cc:** Lee, Timothy <Timothy.Lee@fhfaig.gov>  
**Subject:** LIBOR Memo  
**Sent:** October 18, 2012 4:54 PM  
**Received:** October 18, 2012 4:54 PM

Steve, Tim is cleaning this up tonight, and will have a clean version before the meeting tomorrow. In the interim, this is what we are working with. Rich

[https://sharepoint.fhfaig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%202017.docx](https://sharepoint.fhfaig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20action%20memo%20Oct%202017.docx)

## RE: Libor

---

**Item ID:** 32110  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** RE: Libor  
**Sent:** October 18, 2012 9:23 PM  
**Received:** October 18, 2012 9:23 PM

These files are what I am going with tomorrow. They are already on SharePoint. From: Parker, Richard Sent: Thursday, October 18, 2012 4:42 PM To: Lee, Timothy Subject: FW: Libor If I hunt it in SharePoint, will I find it? From: Linick, Steve Sent: Thursday, October 18, 2012 4:25 PM To: Parker, Richard Cc: (b) (6) Subject: Libor Rich, can I get the latest version of the Libor memo with (b) (6) additions. Also ,please include him in the meeting tmrw. tx

**Attachment #1**

**LIBOR proposal.xlsx**

**Original view**

211 pages (displayed on pages 3 to 213)

## Cash Flow Shortfall from LIBOR Suppression

### Enterprises Variable Rate Mortgage Assets and Interest Rate Swaps

dollars in millions

Column ver	TL						
31-Mar-07	30-Jun-07	30-Sep-07	31-Dec-07	31-Mar-08	30-Jun-08	30-Sep-08	31-Dec-08
<b>Swap Notional Amounts</b>							
<b>Fannie Mae</b>							
Pay Fixed S	303,243	329,657	377,738	443,845	526,028	515,853	546,916
Less: Recei	248,916	256,902	285,885	408,658	409,181	372,555	451,081
Plus: Basis	7,601	8,401	7,001	18,026	25,626	24,761	24,560
Net Receiv	61,928	81,156	98,854	53,213	142,473	168,059	120,395
<b>Freddie Mac</b>							
Less: Rece	214,657	282,070	301,649	326,247	245,054	329,828	279,609
Plus: Pay F	284,927	380,370	409,682	425,450	411,074	452,633	404,359
Plus: Basis	473	1,093	498	17,988	32,205	82,205	82,190
Net Receiv	70,743	99,393	108,531	117,191	198,225	205,010	206,940
<b>Enterprises</b>							
Net Receiv	132,671	180,549	207,385	170,404	340,698	373,069	327,335
<b>Mortgage Related Securities on Balance Sheet</b>							
<b>Fannie Mae</b>							
Capital Ma	333,959	329,158	324,326	314,867	333,124	359,495	362,703
Estimated I	43%	42%	42%	43%	39%	41%	37%
Estimated I	143,728	139,816	136,268	134,230	130,345	146,025	132,796
<b>Freddie Mac</b>							
Fixed Rate	405,650	410,235	417,959	408,735	481,983	437,560	510,116
Variable Ra	306,486	302,929	302,854	303,727	309,815	299,316	294,646
Variable Ra	43%	42%	42%	43%	39%	41%	37%
<b>Floating Rate Liabilities on Balance Sheet</b>							
<b>Fannie Mae</b>							
Floating Rate Short Term Debt			-	4,501	4,501	4,495	7,585
Senior Floa	12,201	15,651	13,700	25,652	33,064	47,087	46,611
<b>Freddie Mac</b>							
Long-Term	24,176	25,487	25,566	23,461	27,093	24,708	13,664
Total Other	483,522	509,744	479,087	469,229	541,851	494,168	433,954
Ratio: Vari	5%	5%	5%	5%	5%	5%	3%

**Enterprises**

Estimated \	413,837	401,606	399,856	384,342	375,502	369,051	359,582
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Fed ED-LIBI	#NAME?						
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**Estimated Damages**

LIBOR Cash	#NAME?						
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LIBOR Cash	#NAME?						
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Prorated LIBOR Cash Flow Shortfall - 9/6/08 thru 9/30/08 **#NAME?**

| TL        |
|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| 31-Mar-09 | 30-Jun-09 | 30-Sep-09 | 31-Dec-09 | 31-Mar-10 | 30-Jun-10 | 30-Sep-10 | 31-Dec-10 | 31-Mar-11 |
| 620,850   | 650,447   | 435,693   | 382,600   | 315,857   | 317,259   | 296,877   | 277,227   | 270,250   |
| 549,823   | 571,802   | 340,384   | 275,417   | 229,293   | 234,901   | 233,613   | 224,177   | 214,777   |
| 19,815    | 22,200    | 11,000    | 3,225     | 3,220     | 3,020     | 2,485     | 485       | 1,565     |
| 90,842    | 100,845   | 106,309   | 110,408   | 89,784    | 85,378    | 65,749    | 53,535    | 57,038    |
| 336,207   | 284,244   | 320,458   | 271,403   | 255,940   | 349,545   | 316,574   | 324,590   | 249,793   |
| 342,747   | 401,901   | 414,776   | 382,259   | 382,145   | 386,194   | 363,668   | 394,294   | 330,015   |
| 82,090    | 51,065    | 51,615    | 52,045    | 54,070    | 53,910    | 2,775     | 2,375     | 3,375     |
| 88,630    | 168,722   | 145,933   | 162,901   | 180,275   | 90,559    | 49,869    | 72,079    | 83,597    |
| 179,472   | 269,567   | 252,242   | 273,309   | 270,059   | 175,937   | 115,618   | 125,614   | 140,635   |
| 353,172   | 369,546   | 368,389   | 352,709   | 434,532   | 391,615   | 373,018   | 361,697   | 335,762   |
| 33%       | 34%       | 34%       | 40%       | 52%       | 52%       | 53%       | 53%       | 52%       |
| 116,457   | 124,378   | 125,616   | 139,775   | 224,780   | 204,120   | 196,789   | 190,011   | 174,970   |
| 581,180   | 550,539   | 516,778   | 372,160   | 159,278   | 148,851   | 139,603   | 137,033   | 136,725   |
| 285,924   | 279,298   | 267,393   | 244,296   | 170,690   | 162,049   | 155,890   | 151,660   | 148,780   |
| 33%       | 34%       | 34%       | 40%       | 52%       | 52%       | 53%       | 53%       | 52%       |
| 3,132     | 3,102     | 3,069     | 50        | -         | -         | -         | -         | -         |
| 58,770    | 68,766    | 51,142    | 42,952    | 46,170    | 45,144    | 49,502    | 72,425    | 74,843    |
| 118,160   | 126,647   | 113,775   | 65,875    | 126,036   | 144,833   | 126,248   | 123,736   | 112,320   |
| 478,379   | 512,742   | 460,626   | 461,051   | 593,174   | 585,630   | 527,318   | 530,978   | 532,324   |
| 25%       | 25%       | 25%       | 14.3%     | 21%       | 25%       | 24%       | 23%       | 21%       |



30-Jun-11 30-Sep-11 31-Dec-11 31-Mar-12 30-Jun-12

205,084	193,882	186,757	206,307	229,227
161,151	179,808	229,695	250,322	265,593
2,552	6,997	9,622	18,673	20,922
46,485	21,071	(33,316)	(25,342)	(15,444)

215,758	220,668	211,808	248,453	260,428
321,870	293,683	289,335	296,573	292,660
3,275	2,275	2,750	2,400	2,350
109,387	75,290	80,277	50,520	34,582

155,872	96,361	46,961	25,178	19,138
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326,384	318,353	310,143	296,886	285,982
52%	52%	53%	54%	55%
169,673	166,610	165,685	160,482	158,349

133,048	128,918	121,676	114,306	106,577
144,053	141,548	139,556	134,484	132,225
52%	52%	53%	54%	55%

70,914	63,391	72,275	73,551	77,403
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106,778	107,422	107,240	104,330	96,962
506,059	509,108	512,871	494,455	459,537
21%	21%	21%	21%	21%

136,034	137,345	125,726	117,085	116,208
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#NAME?	#NAME?	#NAME?	#NAME?	#NAME?
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#NAME?	#NAME?	#NAME?	#NAME?	#NAME?
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Federal  
Reserve  
ED  
Deposits  
Less  
LIBOR, 1  
month  
tenor

**4-Jan-00 through 14-Jun-07**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**15-jun-07 through 7-Sep-08**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**6-sep-08 through 27-jun-12**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

Date	1 month			Date	3 month	
	1 month LIBOR	Fed ED Deposit	1 month Spread		3 month LIBOR	Fed ED Deposit
4-Jan-00	#NAME?	#NAME?	#NAME?	4-Jan-00	#NAME?	#NAME?
5-Jan-00	#NAME?	#NAME?	#NAME?	5-Jan-00	#NAME?	#NAME?
6-Jan-00	#NAME?	#NAME?	#NAME?	6-Jan-00	#NAME?	#NAME?
7-Jan-00	#NAME?	#NAME?	#NAME?	7-Jan-00	#NAME?	#NAME?
10-Jan-00	#NAME?	#NAME?	#NAME?	10-Jan-00	#NAME?	#NAME?
11-Jan-00	#NAME?	#NAME?	#NAME?	11-Jan-00	#NAME?	#NAME?
12-Jan-00	#NAME?	#NAME?	#NAME?	12-Jan-00	#NAME?	#NAME?
13-Jan-00	#NAME?	#NAME?	#NAME?	13-Jan-00	#NAME?	#NAME?
14-Jan-00	#NAME?	#NAME?	#NAME?	14-Jan-00	#NAME?	#NAME?
18-Jan-00	#NAME?	#NAME?	#NAME?	18-Jan-00	#NAME?	#NAME?
19-Jan-00	#NAME?	#NAME?	#NAME?	19-Jan-00	#NAME?	#NAME?
20-Jan-00	#NAME?	#NAME?	#NAME?	20-Jan-00	#NAME?	#NAME?
21-Jan-00	#NAME?	#NAME?	#NAME?	21-Jan-00	#NAME?	#NAME?
24-Jan-00	#NAME?	#NAME?	#NAME?	24-Jan-00	#NAME?	#NAME?
25-Jan-00	#NAME?	#NAME?	#NAME?	25-Jan-00	#NAME?	#NAME?
26-Jan-00	#NAME?	#NAME?	#NAME?	26-Jan-00	#NAME?	#NAME?
27-Jan-00	#NAME?	#NAME?	#NAME?	27-Jan-00	#NAME?	#NAME?
28-Jan-00	#NAME?	#NAME?	#NAME?	28-Jan-00	#NAME?	#NAME?





16-Jun-00	#NAME?	#NAME?	#NAME?	16-Jun-00	#NAME?	#NAME?
19-Jun-00	#NAME?	#NAME?	#NAME?	19-Jun-00	#NAME?	#NAME?
20-Jun-00	#NAME?	#NAME?	#NAME?	20-Jun-00	#NAME?	#NAME?
21-Jun-00	#NAME?	#NAME?	#NAME?	21-Jun-00	#NAME?	#NAME?
22-Jun-00	#NAME?	#NAME?	#NAME?	22-Jun-00	#NAME?	#NAME?
23-Jun-00	#NAME?	#NAME?	#NAME?	23-Jun-00	#NAME?	#NAME?
26-Jun-00	#NAME?	#NAME?	#NAME?	26-Jun-00	#NAME?	#NAME?
27-Jun-00	#NAME?	#NAME?	#NAME?	27-Jun-00	#NAME?	#NAME?
28-Jun-00	#NAME?	#NAME?	#NAME?	28-Jun-00	#NAME?	#NAME?
29-Jun-00	#NAME?	#NAME?	#NAME?	29-Jun-00	#NAME?	#NAME?
30-Jun-00	#NAME?	#NAME?	#NAME?	30-Jun-00	#NAME?	#NAME?
3-Jul-00	#NAME?	#NAME?	#NAME?	3-Jul-00	#NAME?	#NAME?
5-Jul-00	#NAME?	#NAME?	#NAME?	5-Jul-00	#NAME?	#NAME?
6-Jul-00	#NAME?	#NAME?	#NAME?	6-Jul-00	#NAME?	#NAME?
7-Jul-00	#NAME?	#NAME?	#NAME?	7-Jul-00	#NAME?	#NAME?
10-Jul-00	#NAME?	#NAME?	#NAME?	10-Jul-00	#NAME?	#NAME?
11-Jul-00	#NAME?	#NAME?	#NAME?	11-Jul-00	#NAME?	#NAME?
12-Jul-00	#NAME?	#NAME?	#NAME?	12-Jul-00	#NAME?	#NAME?
13-Jul-00	#NAME?	#NAME?	#NAME?	13-Jul-00	#NAME?	#NAME?
14-Jul-00	#NAME?	#NAME?	#NAME?	14-Jul-00	#NAME?	#NAME?
17-Jul-00	#NAME?	#NAME?	#NAME?	17-Jul-00	#NAME?	#NAME?
18-Jul-00	#NAME?	#NAME?	#NAME?	18-Jul-00	#NAME?	#NAME?
19-Jul-00	#NAME?	#NAME?	#NAME?	19-Jul-00	#NAME?	#NAME?
20-Jul-00	#NAME?	#NAME?	#NAME?	20-Jul-00	#NAME?	#NAME?
21-Jul-00	#NAME?	#NAME?	#NAME?	21-Jul-00	#NAME?	#NAME?
24-Jul-00	#NAME?	#NAME?	#NAME?	24-Jul-00	#NAME?	#NAME?
25-Jul-00	#NAME?	#NAME?	#NAME?	25-Jul-00	#NAME?	#NAME?
26-Jul-00	#NAME?	#NAME?	#NAME?	26-Jul-00	#NAME?	#NAME?
27-Jul-00	#NAME?	#NAME?	#NAME?	27-Jul-00	#NAME?	#NAME?
28-Jul-00	#NAME?	#NAME?	#NAME?	28-Jul-00	#NAME?	#NAME?
31-Jul-00	#NAME?	#NAME?	#NAME?	31-Jul-00	#NAME?	#NAME?
1-Aug-00	#NAME?	#NAME?	#NAME?	1-Aug-00	#NAME?	#NAME?
2-Aug-00	#NAME?	#NAME?	#NAME?	2-Aug-00	#NAME?	#NAME?
3-Aug-00	#NAME?	#NAME?	#NAME?	3-Aug-00	#NAME?	#NAME?
4-Aug-00	#NAME?	#NAME?	#NAME?	4-Aug-00	#NAME?	#NAME?
7-Aug-00	#NAME?	#NAME?	#NAME?	7-Aug-00	#NAME?	#NAME?
8-Aug-00	#NAME?	#NAME?	#NAME?	8-Aug-00	#NAME?	#NAME?
9-Aug-00	#NAME?	#NAME?	#NAME?	9-Aug-00	#NAME?	#NAME?
10-Aug-00	#NAME?	#NAME?	#NAME?	10-Aug-00	#NAME?	#NAME?
11-Aug-00	#NAME?	#NAME?	#NAME?	11-Aug-00	#NAME?	#NAME?
14-Aug-00	#NAME?	#NAME?	#NAME?	14-Aug-00	#NAME?	#NAME?
15-Aug-00	#NAME?	#NAME?	#NAME?	15-Aug-00	#NAME?	#NAME?
16-Aug-00	#NAME?	#NAME?	#NAME?	16-Aug-00	#NAME?	#NAME?
17-Aug-00	#NAME?	#NAME?	#NAME?	17-Aug-00	#NAME?	#NAME?
18-Aug-00	#NAME?	#NAME?	#NAME?	18-Aug-00	#NAME?	#NAME?
21-Aug-00	#NAME?	#NAME?	#NAME?	21-Aug-00	#NAME?	#NAME?
22-Aug-00	#NAME?	#NAME?	#NAME?	22-Aug-00	#NAME?	#NAME?



1-Nov-00	#NAME?	#NAME?	#NAME?	1-Nov-00	#NAME?	#NAME?
2-Nov-00	#NAME?	#NAME?	#NAME?	2-Nov-00	#NAME?	#NAME?
3-Nov-00	#NAME?	#NAME?	#NAME?	3-Nov-00	#NAME?	#NAME?
6-Nov-00	#NAME?	#NAME?	#NAME?	6-Nov-00	#NAME?	#NAME?
7-Nov-00	#NAME?	#NAME?	#NAME?	7-Nov-00	#NAME?	#NAME?
8-Nov-00	#NAME?	#NAME?	#NAME?	8-Nov-00	#NAME?	#NAME?
9-Nov-00	#NAME?	#NAME?	#NAME?	9-Nov-00	#NAME?	#NAME?
10-Nov-00	#NAME?	#NAME?	#NAME?	10-Nov-00	#NAME?	#NAME?
13-Nov-00	#NAME?	#NAME?	#NAME?	13-Nov-00	#NAME?	#NAME?
14-Nov-00	#NAME?	#NAME?	#NAME?	14-Nov-00	#NAME?	#NAME?
15-Nov-00	#NAME?	#NAME?	#NAME?	15-Nov-00	#NAME?	#NAME?
16-Nov-00	#NAME?	#NAME?	#NAME?	16-Nov-00	#NAME?	#NAME?
17-Nov-00	#NAME?	#NAME?	#NAME?	17-Nov-00	#NAME?	#NAME?
20-Nov-00	#NAME?	#NAME?	#NAME?	20-Nov-00	#NAME?	#NAME?
21-Nov-00	#NAME?	#NAME?	#NAME?	21-Nov-00	#NAME?	#NAME?
22-Nov-00	#NAME?	#NAME?	#NAME?	22-Nov-00	#NAME?	#NAME?
24-Nov-00	#NAME?	#NAME?	#NAME?	24-Nov-00	#NAME?	#NAME?
27-Nov-00	#NAME?	#NAME?	#NAME?	27-Nov-00	#NAME?	#NAME?
28-Nov-00	#NAME?	#NAME?	#NAME?	28-Nov-00	#NAME?	#NAME?
29-Nov-00	#NAME?	#NAME?	#NAME?	29-Nov-00	#NAME?	#NAME?
30-Nov-00	#NAME?	#NAME?	#NAME?	30-Nov-00	#NAME?	#NAME?
1-Dec-00	#NAME?	#NAME?	#NAME?	1-Dec-00	#NAME?	#NAME?
4-Dec-00	#NAME?	#NAME?	#NAME?	4-Dec-00	#NAME?	#NAME?
5-Dec-00	#NAME?	#NAME?	#NAME?	5-Dec-00	#NAME?	#NAME?
6-Dec-00	#NAME?	#NAME?	#NAME?	6-Dec-00	#NAME?	#NAME?
7-Dec-00	#NAME?	#NAME?	#NAME?	7-Dec-00	#NAME?	#NAME?
8-Dec-00	#NAME?	#NAME?	#NAME?	8-Dec-00	#NAME?	#NAME?
11-Dec-00	#NAME?	#NAME?	#NAME?	11-Dec-00	#NAME?	#NAME?
12-Dec-00	#NAME?	#NAME?	#NAME?	12-Dec-00	#NAME?	#NAME?
13-Dec-00	#NAME?	#NAME?	#NAME?	13-Dec-00	#NAME?	#NAME?
14-Dec-00	#NAME?	#NAME?	#NAME?	14-Dec-00	#NAME?	#NAME?
15-Dec-00	#NAME?	#NAME?	#NAME?	15-Dec-00	#NAME?	#NAME?
18-Dec-00	#NAME?	#NAME?	#NAME?	18-Dec-00	#NAME?	#NAME?
19-Dec-00	#NAME?	#NAME?	#NAME?	19-Dec-00	#NAME?	#NAME?
20-Dec-00	#NAME?	#NAME?	#NAME?	20-Dec-00	#NAME?	#NAME?
21-Dec-00	#NAME?	#NAME?	#NAME?	21-Dec-00	#NAME?	#NAME?
22-Dec-00	#NAME?	#NAME?	#NAME?	22-Dec-00	#NAME?	#NAME?
27-Dec-00	#NAME?	#NAME?	#NAME?	27-Dec-00	#NAME?	#NAME?
28-Dec-00	#NAME?	#NAME?	#NAME?	28-Dec-00	#NAME?	#NAME?
29-Dec-00	#NAME?	#NAME?	#NAME?	29-Dec-00	#NAME?	#NAME?
2-Jan-01	#NAME?	#NAME?	#NAME?	2-Jan-01	#NAME?	#NAME?
3-Jan-01	#NAME?	#NAME?	#NAME?	3-Jan-01	#NAME?	#NAME?
4-Jan-01	#NAME?	#NAME?	#NAME?	4-Jan-01	#NAME?	#NAME?
5-Jan-01	#NAME?	#NAME?	#NAME?	5-Jan-01	#NAME?	#NAME?
8-Jan-01	#NAME?	#NAME?	#NAME?	8-Jan-01	#NAME?	#NAME?
9-Jan-01	#NAME?	#NAME?	#NAME?	9-Jan-01	#NAME?	#NAME?
10-Jan-01	#NAME?	#NAME?	#NAME?	10-Jan-01	#NAME?	#NAME?

11-Jan-01	#NAME?	#NAME?	#NAME?	11-Jan-01	#NAME?	#NAME?
12-Jan-01	#NAME?	#NAME?	#NAME?	12-Jan-01	#NAME?	#NAME?
16-Jan-01	#NAME?	#NAME?	#NAME?	16-Jan-01	#NAME?	#NAME?
17-Jan-01	#NAME?	#NAME?	#NAME?	17-Jan-01	#NAME?	#NAME?
18-Jan-01	#NAME?	#NAME?	#NAME?	18-Jan-01	#NAME?	#NAME?
19-Jan-01	#NAME?	#NAME?	#NAME?	19-Jan-01	#NAME?	#NAME?
22-Jan-01	#NAME?	#NAME?	#NAME?	22-Jan-01	#NAME?	#NAME?
23-Jan-01	#NAME?	#NAME?	#NAME?	23-Jan-01	#NAME?	#NAME?
24-Jan-01	#NAME?	#NAME?	#NAME?	24-Jan-01	#NAME?	#NAME?
25-Jan-01	#NAME?	#NAME?	#NAME?	25-Jan-01	#NAME?	#NAME?
26-Jan-01	#NAME?	#NAME?	#NAME?	26-Jan-01	#NAME?	#NAME?
29-Jan-01	#NAME?	#NAME?	#NAME?	29-Jan-01	#NAME?	#NAME?
30-Jan-01	#NAME?	#NAME?	#NAME?	30-Jan-01	#NAME?	#NAME?
31-Jan-01	#NAME?	#NAME?	#NAME?	31-Jan-01	#NAME?	#NAME?
1-Feb-01	#NAME?	#NAME?	#NAME?	1-Feb-01	#NAME?	#NAME?
2-Feb-01	#NAME?	#NAME?	#NAME?	2-Feb-01	#NAME?	#NAME?
5-Feb-01	#NAME?	#NAME?	#NAME?	5-Feb-01	#NAME?	#NAME?
6-Feb-01	#NAME?	#NAME?	#NAME?	6-Feb-01	#NAME?	#NAME?
7-Feb-01	#NAME?	#NAME?	#NAME?	7-Feb-01	#NAME?	#NAME?
8-Feb-01	#NAME?	#NAME?	#NAME?	8-Feb-01	#NAME?	#NAME?
9-Feb-01	#NAME?	#NAME?	#NAME?	9-Feb-01	#NAME?	#NAME?
12-Feb-01	#NAME?	#NAME?	#NAME?	12-Feb-01	#NAME?	#NAME?
13-Feb-01	#NAME?	#NAME?	#NAME?	13-Feb-01	#NAME?	#NAME?
14-Feb-01	#NAME?	#NAME?	#NAME?	14-Feb-01	#NAME?	#NAME?
15-Feb-01	#NAME?	#NAME?	#NAME?	15-Feb-01	#NAME?	#NAME?
16-Feb-01	#NAME?	#NAME?	#NAME?	16-Feb-01	#NAME?	#NAME?
20-Feb-01	#NAME?	#NAME?	#NAME?	20-Feb-01	#NAME?	#NAME?
21-Feb-01	#NAME?	#NAME?	#NAME?	21-Feb-01	#NAME?	#NAME?
22-Feb-01	#NAME?	#NAME?	#NAME?	22-Feb-01	#NAME?	#NAME?
23-Feb-01	#NAME?	#NAME?	#NAME?	23-Feb-01	#NAME?	#NAME?
26-Feb-01	#NAME?	#NAME?	#NAME?	26-Feb-01	#NAME?	#NAME?
27-Feb-01	#NAME?	#NAME?	#NAME?	27-Feb-01	#NAME?	#NAME?
28-Feb-01	#NAME?	#NAME?	#NAME?	28-Feb-01	#NAME?	#NAME?
1-Mar-01	#NAME?	#NAME?	#NAME?	1-Mar-01	#NAME?	#NAME?
2-Mar-01	#NAME?	#NAME?	#NAME?	2-Mar-01	#NAME?	#NAME?
5-Mar-01	#NAME?	#NAME?	#NAME?	5-Mar-01	#NAME?	#NAME?
6-Mar-01	#NAME?	#NAME?	#NAME?	6-Mar-01	#NAME?	#NAME?
7-Mar-01	#NAME?	#NAME?	#NAME?	7-Mar-01	#NAME?	#NAME?
8-Mar-01	#NAME?	#NAME?	#NAME?	8-Mar-01	#NAME?	#NAME?
9-Mar-01	#NAME?	#NAME?	#NAME?	9-Mar-01	#NAME?	#NAME?
12-Mar-01	#NAME?	#NAME?	#NAME?	12-Mar-01	#NAME?	#NAME?
13-Mar-01	#NAME?	#NAME?	#NAME?	13-Mar-01	#NAME?	#NAME?
14-Mar-01	#NAME?	#NAME?	#NAME?	14-Mar-01	#NAME?	#NAME?
15-Mar-01	#NAME?	#NAME?	#NAME?	15-Mar-01	#NAME?	#NAME?
16-Mar-01	#NAME?	#NAME?	#NAME?	16-Mar-01	#NAME?	#NAME?
19-Mar-01	#NAME?	#NAME?	#NAME?	19-Mar-01	#NAME?	#NAME?
20-Mar-01	#NAME?	#NAME?	#NAME?	20-Mar-01	#NAME?	#NAME?



#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?
1-Jun-01	#NAME?	#NAME?	#NAME?	1-Jun-01	#NAME?	#NAME?
4-Jun-01	#NAME?	#NAME?	#NAME?	4-Jun-01	#NAME?	#NAME?
5-Jun-01	#NAME?	#NAME?	#NAME?	5-Jun-01	#NAME?	#NAME?
6-Jun-01	#NAME?	#NAME?	#NAME?	6-Jun-01	#NAME?	#NAME?
7-Jun-01	#NAME?	#NAME?	#NAME?	7-Jun-01	#NAME?	#NAME?
8-Jun-01	#NAME?	#NAME?	#NAME?	8-Jun-01	#NAME?	#NAME?
11-Jun-01	#NAME?	#NAME?	#NAME?	11-Jun-01	#NAME?	#NAME?
12-Jun-01	#NAME?	#NAME?	#NAME?	12-Jun-01	#NAME?	#NAME?
13-Jun-01	#NAME?	#NAME?	#NAME?	13-Jun-01	#NAME?	#NAME?
14-Jun-01	#NAME?	#NAME?	#NAME?	14-Jun-01	#NAME?	#NAME?
15-Jun-01	#NAME?	#NAME?	#NAME?	15-Jun-01	#NAME?	#NAME?
18-Jun-01	#NAME?	#NAME?	#NAME?	18-Jun-01	#NAME?	#NAME?
19-Jun-01	#NAME?	#NAME?	#NAME?	19-Jun-01	#NAME?	#NAME?
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2-Apr-04	#NAME?	#NAME?	#NAME?	2-Apr-04	#NAME?	#NAME?
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7-Apr-04	#NAME?	#NAME?	#NAME?	7-Apr-04	#NAME?	#NAME?
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19-Apr-04	#NAME?	#NAME?	#NAME?	19-Apr-04	#NAME?	#NAME?
20-Apr-04	#NAME?	#NAME?	#NAME?	20-Apr-04	#NAME?	#NAME?



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USD3MTD156N		USD1MTD156N		DED1		DED3	
lin	Percent	lin	Percent	lin	Percent	lin	Percent
D	Daily	D	Daily	D	Daily	D	Daily
1/1/2000	1986-01-02	1/1/2000	1986-01-02	1/1/2000	1971-01-04	1/1/2000	1971-01-04 to 2012-09
<a href="#">3-Month London Inter</a>		<a href="#">1-Month London Inter</a>		<a href="#">1-Month Eurodollar De</a>		<a href="#">3-Month Eurodollar Deposit Rate</a>	
British Bankers' Associ		British Bankers' Associ		Board of Governors of		Board of Governors of the Federal	
date	value	date	value	date	value	date	value
1/4/2000	6.0	1/4/2000	5.8	1/3/2000	5.7	1/3/2000	5.9
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1/6/2000	6.0	1/6/2000	5.8	1/5/2000	5.7	1/5/2000	5.9
1/7/2000	6.0	1/7/2000	5.8	1/6/2000	5.7	1/6/2000	5.9
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2/4/2000	6.1	2/4/2000	5.9	2/3/2000	5.8	2/3/2000	6.0
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1/7/2002	1.9	1/7/2002	1.9	#####	1.9	#####	1.8
1/8/2002	1.8	1/8/2002	1.8	#####	1.9	#####	1.8



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#####	2.0	#####	1.9	3/4/2002	1.8	3/4/2002	1.8
#####	2.0	#####	1.9	3/5/2002	1.8	3/5/2002	1.8
4/2/2002	2.0	4/2/2002	1.9	3/6/2002	1.8	3/6/2002	1.8
4/3/2002	2.0	4/3/2002	1.9	3/7/2002	1.8	3/7/2002	1.8
4/4/2002	2.0	4/4/2002	1.9	3/8/2002	1.8	3/8/2002	1.9
4/5/2002	2.0	4/5/2002	1.9	#####	1.8	#####	1.9
4/8/2002	2.0	4/8/2002	1.9	#####	1.8	#####	1.9
4/9/2002	2.0	4/9/2002	1.9	#####	1.8	#####	1.9
#####	2.0	#####	1.9	#####	1.8	#####	1.9
#####	2.0	#####	1.9	#####	1.8	#####	1.9
#####	2.0	#####	1.9	#####	1.9	#####	1.9
#####	2.0	#####	1.9	#####	1.9	#####	1.9
#####	2.0	#####	1.9	#####	1.8	#####	1.9
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5/1/2002	1.9	5/1/2002	1.8	4/4/2002	1.8	4/4/2002	1.9
5/2/2002	1.9	5/2/2002	1.8	4/5/2002	1.8	4/5/2002	1.9
5/3/2002	1.9	5/3/2002	1.8	4/8/2002	1.8	4/8/2002	1.9
5/7/2002	1.9	5/7/2002	1.8	4/9/2002	1.8	4/9/2002	1.9
5/8/2002	1.9	5/8/2002	1.8	#####	1.8	#####	1.9
5/9/2002	1.9	5/9/2002	1.8	#####	1.8	#####	1.9
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#####	1.9	#####	1.8	#####	1.8	#####	1.9
#####	1.9	#####	1.8	#####	1.8	#####	1.9
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3/3/2003	1.3	3/3/2003	1.3	#####	1.3	#####	1.3
3/4/2003	1.3	3/4/2003	1.3	#####	1.3	#####	1.3
3/5/2003	1.3	3/5/2003	1.3	#####	1.3	#####	1.3
3/6/2003	1.3	3/6/2003	1.3	#####	1.3	#####	1.3
3/7/2003	1.3	3/7/2003	1.3	#####	1.3	#####	1.3
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4/1/2003	1.3	4/1/2003	1.3	#####	1.3	#####	1.3
4/2/2003	1.3	4/2/2003	1.3	#####	1.3	#####	1.3
4/3/2003	1.3	4/3/2003	1.3	#####	1.3	#####	1.3
4/4/2003	1.3	4/4/2003	1.3	#####	1.3	#####	1.3
4/7/2003	1.3	4/7/2003	1.3	#####	1.3	#####	1.3
4/8/2003	1.3	4/8/2003	1.3	3/3/2003	1.3	3/3/2003	1.3
4/9/2003	1.3	4/9/2003	1.3	3/4/2003	1.3	3/4/2003	1.3
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#####	1.3	#####	1.3	#####	1.2	#####	1.2
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#####	1.3	#####	1.3	#####	1.2	#####	1.2
#####	1.3	#####	1.3	#####	1.2	#####	1.2
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#####	1.3	#####	1.3	#####	1.2	#####	1.2
#####	1.3	#####	1.3	#####	1.3	#####	1.2
#####	1.3	#####	1.3	#####	1.3	#####	1.2



7/8/2003	1.1	7/8/2003	1.1	#####	1.3	#####	1.2
7/9/2003	1.1	7/9/2003	1.1	#####	1.3	#####	1.2
#####	1.1	#####	1.1	#####	1.3	#####	1.2
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#####	1.1	#####	1.1	6/2/2003	1.3	6/2/2003	1.2
#####	1.1	#####	1.1	6/3/2003	1.3	6/3/2003	1.2
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#####	1.1	#####	1.1	6/5/2003	1.2	6/5/2003	1.1
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#####	1.1	#####	1.1	#####	1.0	#####	1.0
#####	1.1	#####	1.1	#####	1.0	#####	0.9
8/1/2003	1.1	8/1/2003	1.1	#####	1.0	#####	0.9
8/4/2003	1.1	8/4/2003	1.1	#####	1.0	#####	0.9
8/5/2003	1.1	8/5/2003	1.1	#####	0.9	#####	0.9
8/6/2003	1.1	8/6/2003	1.1	#####	0.9	#####	0.9
8/7/2003	1.1	8/7/2003	1.1	#####	1.1	#####	1.0
8/8/2003	1.1	8/8/2003	1.1	#####	1.1	#####	1.0
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#####	1.1	#####	1.1	7/9/2003	1.1	7/9/2003	1.0
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#####	1.1	#####	1.1	#####	1.0	#####	1.0
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9/1/2003	1.1	9/1/2003	1.1	#####	1.0	#####	1.0
9/2/2003	1.1	9/2/2003	1.1	#####	1.0	#####	1.1
9/3/2003	1.1	9/3/2003	1.1	#####	1.0	#####	1.0
9/4/2003	1.1	9/4/2003	1.1	#####	1.0	#####	1.0
9/5/2003	1.1	9/5/2003	1.1	#####	1.0	#####	1.0
9/8/2003	1.1	9/8/2003	1.1	#####	1.0	#####	1.0
9/9/2003	1.1	9/9/2003	1.1	#####	1.0	#####	1.0
#####	1.1	#####	1.1	#####	1.0	#####	1.1
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4/1/2004	1.1	4/1/2004	1.1	#####	1.0	#####	1.1
4/2/2004	1.1	4/2/2004	1.1	#####	#N/A	#####	#N/A
4/5/2004	1.1	4/5/2004	1.1	#####	1.0	#####	1.0
4/6/2004	1.1	4/6/2004	1.1	#####	1.0	#####	1.0
4/7/2004	1.1	4/7/2004	1.1	#####	1.0	#####	1.1
4/8/2004	1.1	4/8/2004	1.1	#####	1.0	#####	1.0
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#####	1.2	#####	1.1	3/1/2004	1.0	3/1/2004	1.0
#####	1.2	#####	1.1	3/2/2004	1.0	3/2/2004	1.0
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#####	1.2	#####	1.1	3/5/2004	1.0	3/5/2004	1.0
#####	1.2	#####	1.1	3/8/2004	1.0	3/8/2004	1.0
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5/4/2004	1.2	5/4/2004	1.1	#####	1.0	#####	1.0
5/5/2004	1.2	5/5/2004	1.1	#####	1.0	#####	1.0
5/6/2004	1.2	5/6/2004	1.1	#####	1.0	#####	1.0
5/7/2004	1.2	5/7/2004	1.1	#####	1.0	#####	1.0
#####	1.2	#####	1.1	#####	1.0	#####	1.0
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#####	1.3	#####	1.1	4/1/2004	1.0	4/1/2004	1.0
#####	1.3	#####	1.1	4/2/2004	1.0	4/2/2004	1.0
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6/2/2004	1.3	6/2/2004	1.1	4/9/2004	#N/A	4/9/2004	#N/A
6/3/2004	1.4	6/3/2004	1.2	#####	1.0	#####	1.1
6/4/2004	1.4	6/4/2004	1.2	#####	1.0	#####	1.1
6/7/2004	1.4	6/7/2004	1.2	#####	1.0	#####	1.1
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6/9/2004	1.4	6/9/2004	1.2	#####	1.0	#####	1.1
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1/5/2005	2.6	1/5/2005	2.4	#####	2.0	#####	2.2
1/6/2005	2.6	1/6/2005	2.4	#####	2.0	#####	2.2
1/7/2005	2.6	1/7/2005	2.4	#####	2.0	#####	2.2
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3/1/2005	2.9	3/1/2005	2.7	#####	2.3	#####	2.5
3/2/2005	2.9	3/2/2005	2.7	1/3/2005	2.3	1/3/2005	2.5
3/3/2005	3.0	3/3/2005	2.7	1/4/2005	2.3	1/4/2005	2.5
3/4/2005	3.0	3/4/2005	2.8	1/5/2005	2.3	1/5/2005	2.5
3/7/2005	3.0	3/7/2005	2.8	1/6/2005	2.4	1/6/2005	2.6

3/8/2005	3.0	3/8/2005	2.8	1/7/2005	2.4	1/7/2005	2.6
3/9/2005	3.0	3/9/2005	2.8	#####	2.4	#####	2.6
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#####	3.0	#####	2.8	#####	2.4	#####	2.6
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#####	3.0	#####	2.8	#####	#N/A	#####	#N/A
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4/5/2005	3.1	4/5/2005	2.9	2/2/2005	2.5	2/2/2005	2.7
4/6/2005	3.1	4/6/2005	2.9	2/3/2005	2.5	2/3/2005	2.7
4/7/2005	3.1	4/7/2005	2.9	2/4/2005	2.5	2/4/2005	2.7
4/8/2005	3.1	4/8/2005	2.9	2/7/2005	2.5	2/7/2005	2.7
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#####	3.1	#####	3.0	#####	2.5	#####	2.7
#####	3.2	#####	3.0	#####	2.5	#####	2.7
#####	3.2	#####	3.0	#####	2.5	#####	2.7
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5/4/2005	3.2	5/4/2005	3.1	3/2/2005	2.7	3/2/2005	2.9
5/5/2005	3.2	5/5/2005	3.1	3/3/2005	2.7	3/3/2005	2.9
5/6/2005	3.2	5/6/2005	3.1	3/4/2005	2.7	3/4/2005	2.9
5/9/2005	3.3	5/9/2005	3.1	3/7/2005	2.7	3/7/2005	2.9
#####	3.3	#####	3.1	3/8/2005	2.7	3/8/2005	2.9
#####	3.3	#####	3.1	3/9/2005	2.7	3/9/2005	2.9
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8/5/2005	3.8	8/5/2005	3.6	6/2/2005	3.1	6/2/2005	3.3
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9/1/2006	5.4	9/1/2006	5.3	#####	5.3	#####	5.4













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1/3/2008	4.6	1/3/2008	4.5	#####	5.2	#####	5.3
1/4/2008	4.6	1/4/2008	4.5	#####	5.2	#####	5.3
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1/8/2008	4.5	1/8/2008	4.4	#####	#N/A	#####	#N/A
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2/5/2008	3.2	2/5/2008	3.2	#####	4.7	#####	4.8
2/6/2008	3.1	2/6/2008	3.2	#####	4.7	#####	4.9
2/7/2008	3.1	2/7/2008	3.2	#####	4.7	#####	4.9
2/8/2008	3.1	2/8/2008	3.2	#####	4.7	#####	4.9
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3/4/2008	3.0	3/4/2008	3.1	#####	5.6	#####	5.3
3/5/2008	3.0	3/5/2008	3.1	#####	5.5	#####	5.3
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3/7/2008	2.9	3/7/2008	3.0	#####	5.5	#####	5.3
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#####	2.7	#####	2.7	#####	5.2	#####	5.2
#####	2.7	#####	2.7	#####	5.1	#####	5.1
#####	2.7	#####	2.7	#####	#N/A	#####	#N/A
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4/2/2008	2.7	4/2/2008	2.7	#####	4.7	#####	4.9
4/3/2008	2.7	4/3/2008	2.7	#####	4.7	#####	4.9
4/4/2008	2.7	4/4/2008	2.7	1/1/2008	#N/A	1/1/2008	#N/A
4/7/2008	2.7	4/7/2008	2.7	1/2/2008	4.7	1/2/2008	4.7
4/8/2008	2.7	4/8/2008	2.7	1/3/2008	4.6	1/3/2008	4.8
4/9/2008	2.7	4/9/2008	2.7	1/4/2008	4.6	1/4/2008	4.8
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#####	2.7	#####	2.7	1/8/2008	4.5	1/8/2008	4.6
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5/2/2008	2.8	5/2/2008	2.7	#####	3.3	#####	3.3
5/6/2008	2.8	5/6/2008	2.7	#####	3.3	#####	3.3

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5/9/2008	2.7	5/9/2008	2.6	2/4/2008	3.3	2/4/2008	3.2
#####	2.7	#####	2.5	2/5/2008	3.3	2/5/2008	3.3
#####	2.7	#####	2.5	2/6/2008	3.3	2/6/2008	3.2
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6/3/2008	2.7	6/3/2008	2.5	#####	3.2	#####	3.1
6/4/2008	2.7	6/4/2008	2.5	#####	3.2	#####	3.1
6/5/2008	2.7	6/5/2008	2.4	#####	3.2	#####	3.1
6/6/2008	2.7	6/6/2008	2.4	#####	3.2	#####	3.1
6/9/2008	2.7	6/9/2008	2.4	3/3/2008	3.1	3/3/2008	3.1
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#####	2.8	#####	2.5	3/6/2008	3.1	3/6/2008	3.0
#####	2.8	#####	2.5	3/7/2008	3.0	3/7/2008	3.0
#####	2.8	#####	2.5	#####	3.0	#####	2.9
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#####	2.8	#####	2.5	#####	2.7	#####	2.7
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7/2/2008	2.8	7/2/2008	2.5	#####	2.8	#####	2.8
7/3/2008	2.8	7/3/2008	2.5	#####	2.9	#####	2.9
7/4/2008	2.8	7/4/2008	2.5	#####	2.9	#####	3.0
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7/9/2008	2.8	7/9/2008	2.5	4/2/2008	3.0	4/2/2008	3.0
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#####	2.8	#####	2.5	4/4/2008	3.0	4/4/2008	3.0

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8/4/2008	2.8	8/4/2008	2.5	#####	3.0	#####	3.2
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8/6/2008	2.8	8/6/2008	2.5	#####	2.9	#####	3.2
8/7/2008	2.8	8/7/2008	2.5	5/1/2008	2.9	5/1/2008	3.0
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9/5/2008	2.8	9/5/2008	2.5	#####	2.6	#####	2.9
9/8/2008	2.8	9/8/2008	2.5	#####	2.6	#####	2.9
9/9/2008	2.8	9/9/2008	2.5	6/2/2008	2.6	6/2/2008	2.9
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#####	2.8	#####	2.5	6/5/2008	2.6	6/5/2008	2.9
#####	2.8	#####	2.5	6/6/2008	2.7	6/6/2008	2.9
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#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0

#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.7	#####	3.0
#####	2.2	#####	1.8	#####	2.7	#####	3.0
#####	2.2	#####	1.6	9/1/2008	#N/A	9/1/2008	#N/A
#####	2.1	#####	1.4	9/2/2008	2.6	9/2/2008	3.0
#####	2.0	#####	1.2	9/3/2008	2.6	9/3/2008	3.0
#####	1.9	#####	1.0	9/4/2008	2.6	9/4/2008	3.0
#####	1.9	#####	1.0	9/5/2008	2.6	9/5/2008	3.0
#####	1.8	#####	0.9	9/8/2008	2.7	9/8/2008	3.0
#####	1.6	#####	0.6	9/9/2008	2.7	9/9/2008	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	3.2	#####	3.2
#####	1.5	#####	0.5	#####	3.8	#####	3.8
#####	1.4	#####	0.4	#####	6.0	#####	5.0
#####	1.4	#####	0.4	#####	6.0	#####	5.0
1/2/2009	1.4	1/2/2009	0.4	#####	5.0	#####	5.0
1/5/2009	1.4	1/5/2009	0.4	#####	5.3	#####	5.0
1/6/2009	1.4	1/6/2009	0.4	#####	5.3	#####	5.0
1/7/2009	1.4	1/7/2009	0.4	#####	5.5	#####	5.0
1/8/2009	1.4	1/8/2009	0.4	#####	5.5	#####	5.0
1/9/2009	1.3	1/9/2009	0.4	#####	5.5	#####	5.0
#####	1.2	#####	0.3	#####	7.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.5	#####	6.0
#####	1.1	#####	0.4	#####	7.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	#N/A	#####	#N/A
#####	1.2	#####	0.4	#####	5.8	#####	6.0
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.0	#####	5.8
#####	1.2	#####	0.4	#####	4.3	#####	5.0

2/2/2009	1.2	2/2/2009	0.4	#####	4.0	#####	4.5
2/3/2009	1.2	2/3/2009	0.4	#####	3.8	#####	4.5
2/4/2009	1.2	2/4/2009	0.4	#####	3.8	#####	4.5
2/5/2009	1.2	2/5/2009	0.4	#####	3.8	#####	4.5
2/6/2009	1.2	2/6/2009	0.4	#####	3.8	#####	4.5
2/9/2009	1.2	2/9/2009	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	2.8	#####	4.3
#####	1.2	#####	0.5	#####	2.5	#####	4.0
#####	1.2	#####	0.5	#####	2.3	#####	3.3
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	#N/A	#####	#N/A
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	1.8	#####	3.0
3/2/2009	1.3	3/2/2009	0.5	#####	1.8	#####	3.0
3/3/2009	1.3	3/3/2009	0.5	#####	1.8	#####	3.0
3/4/2009	1.3	3/4/2009	0.5	#####	1.8	#####	3.0
3/5/2009	1.3	3/5/2009	0.5	#####	1.9	#####	3.0
3/6/2009	1.3	3/6/2009	0.5	#####	2.0	#####	3.0
3/9/2009	1.3	3/9/2009	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	#N/A	#####	#N/A
#####	1.3	#####	0.6	#####	2.8	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.5	#####	2.6	#####	3.0
#####	1.2	#####	0.5	#####	2.7	#####	3.0
#####	1.2	#####	0.5	#####	2.3	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	2.9
#####	1.2	#####	0.5	#####	1.5	#####	2.6
#####	1.2	#####	0.5	#####	1.3	#####	2.2
#####	1.2	#####	0.5	#####	1.3	#####	2.0
4/1/2009	1.2	4/1/2009	0.5	#####	1.3	#####	2.0
4/2/2009	1.2	4/2/2009	0.5	#####	1.3	#####	2.0
4/3/2009	1.2	4/3/2009	0.5	#####	1.3	#####	2.0
4/6/2009	1.2	4/6/2009	0.5	#####	1.2	#####	2.0
4/7/2009	1.1	4/7/2009	0.5	#####	1.2	#####	2.0



#####	0.6	#####	0.3	3/2/2009	0.8	3/2/2009	1.7
#####	0.6	#####	0.3	3/3/2009	0.9	3/3/2009	1.7
#####	0.6	#####	0.3	3/4/2009	0.8	3/4/2009	1.7
#####	0.6	#####	0.3	3/5/2009	0.8	3/5/2009	1.7
#####	0.6	#####	0.3	3/6/2009	0.8	3/6/2009	1.7
#####	0.6	#####	0.3	3/9/2009	0.9	3/9/2009	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
7/1/2009	0.6	7/1/2009	0.3	#####	1.0	#####	1.7
7/2/2009	0.6	7/2/2009	0.3	#####	1.0	#####	1.7
7/3/2009	0.6	7/3/2009	0.3	#####	1.0	#####	1.7
7/6/2009	0.5	7/6/2009	0.3	#####	1.0	#####	1.7
7/7/2009	0.5	7/7/2009	0.3	#####	1.0	#####	1.6
7/8/2009	0.5	7/8/2009	0.3	#####	1.0	#####	1.6
7/9/2009	0.5	7/9/2009	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.6	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	4/1/2009	1.0	4/1/2009	1.6
#####	0.5	#####	0.3	4/2/2009	1.0	4/2/2009	1.6
#####	0.5	#####	0.3	4/3/2009	1.0	4/3/2009	1.6
#####	0.5	#####	0.3	4/6/2009	1.0	4/6/2009	1.6
#####	0.5	#####	0.3	4/7/2009	1.0	4/7/2009	1.6
#####	0.5	#####	0.3	4/8/2009	1.0	4/8/2009	1.6
#####	0.5	#####	0.3	4/9/2009	0.8	4/9/2009	1.5
#####	0.5	#####	0.3	#####	#N/A	#####	#N/A
#####	0.5	#####	0.3	#####	0.8	#####	1.5
#####	0.5	#####	0.3	#####	1.0	#####	1.5
8/3/2009	0.5	8/3/2009	0.3	#####	1.0	#####	1.5
8/4/2009	0.5	8/4/2009	0.3	#####	1.0	#####	1.5
8/5/2009	0.5	8/5/2009	0.3	#####	1.0	#####	1.5
8/6/2009	0.5	8/6/2009	0.3	#####	1.0	#####	1.5
8/7/2009	0.5	8/7/2009	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	5/1/2009	0.9	5/1/2009	1.4
#####	0.4	#####	0.3	5/4/2009	0.9	5/4/2009	1.4
#####	0.4	#####	0.3	5/5/2009	0.8	5/5/2009	1.4



#####	0.3	#####	0.2	#####	0.6	#####	1.0
#####	0.3	#####	0.2	#####	0.6	#####	1.1
#####	0.3	#####	0.2	#####	0.6	#####	1.0
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	8/3/2009	0.5	8/3/2009	0.8
#####	0.3	#####	0.2	8/4/2009	0.5	8/4/2009	0.8
#####	0.3	#####	0.2	8/5/2009	0.5	8/5/2009	0.8
#####	0.3	#####	0.2	8/6/2009	0.5	8/6/2009	0.8
#####	0.3	#####	0.2	8/7/2009	0.5	8/7/2009	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.2	#####	0.2	9/1/2009	0.5	9/1/2009	0.6
#####	0.2	#####	0.2	9/2/2009	0.5	9/2/2009	0.5
#####	0.3	#####	0.2	9/3/2009	0.5	9/3/2009	0.6
#####	0.3	#####	0.2	9/4/2009	0.5	9/4/2009	0.6
#####	0.3	#####	0.2	9/7/2009	#N/A	9/7/2009	#N/A
#####	0.3	#####	0.2	9/8/2009	0.4	9/8/2009	0.6
#####	0.3	#####	0.2	9/9/2009	0.4	9/9/2009	0.6
1/4/2010	0.3	1/4/2010	0.2	#####	0.4	#####	0.6
1/5/2010	0.3	1/5/2010	0.2	#####	0.4	#####	0.6
1/6/2010	0.3	1/6/2010	0.2	#####	0.4	#####	0.5

















7/6/2011	0.2	7/6/2011	0.2	#####	0.3	#####	0.4
7/7/2011	0.2	7/7/2011	0.2	#####	0.3	#####	0.4
7/8/2011	0.2	7/8/2011	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	3/1/2011	0.3	3/1/2011	0.4
#####	0.2	#####	0.2	3/2/2011	0.3	3/2/2011	0.4
#####	0.2	#####	0.2	3/3/2011	0.3	3/3/2011	0.4
#####	0.2	#####	0.2	3/4/2011	0.3	3/4/2011	0.4
#####	0.3	#####	0.2	3/7/2011	0.3	3/7/2011	0.4
#####	0.3	#####	0.2	3/8/2011	0.3	3/8/2011	0.4
#####	0.3	#####	0.2	3/9/2011	0.3	3/9/2011	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
8/1/2011	0.3	8/1/2011	0.2	#####	0.3	#####	0.4
8/2/2011	0.3	8/2/2011	0.2	#####	0.3	#####	0.4
8/3/2011	0.3	8/3/2011	0.2	#####	0.3	#####	0.4
8/4/2011	0.3	8/4/2011	0.2	#####	0.3	#####	0.4
8/5/2011	0.3	8/5/2011	0.2	#####	0.3	#####	0.4
8/8/2011	0.3	8/8/2011	0.2	#####	0.3	#####	0.4
8/9/2011	0.3	8/9/2011	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	4/1/2011	0.3	4/1/2011	0.4
#####	0.3	#####	0.2	4/4/2011	0.3	4/4/2011	0.4
#####	0.3	#####	0.2	4/5/2011	0.3	4/5/2011	0.4
#####	0.3	#####	0.2	4/6/2011	0.3	4/6/2011	0.4
#####	0.3	#####	0.2	4/7/2011	0.3	4/7/2011	0.4
#####	0.3	#####	0.2	4/8/2011	0.3	4/8/2011	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
9/1/2011	0.3	9/1/2011	0.2	#####	0.3	#####	0.4
9/2/2011	0.3	9/2/2011	0.2	#####	0.3	#####	0.4
9/5/2011	0.3	9/5/2011	0.2	#####	0.3	#####	0.4
9/6/2011	0.3	9/6/2011	0.2	#####	0.3	#####	0.4
9/7/2011	0.3	9/7/2011	0.2	#####	0.3	#####	0.4
9/8/2011	0.3	9/8/2011	0.2	#####	0.3	#####	0.4
9/9/2011	0.3	9/9/2011	0.2	#####	0.3	#####	0.4

















I-26

[London](#)

Reserve System

Underwriter	Security purchased by the Enterprise	LIBOR-Based Interest Rate	CUSIP	Risk Factors language: Underwriters may rip you off by manipulating your reference index	Reviewer
Bank of America	BAFC 2007	1mL + 16	05952DAA1	FALSE	Timothy Lee
Barclays Capital	FHLT 2005	1mL + 26	35729PMA	FALSE	Timothy Lee
		Tied to mortgage rates, which are keyed inter alia to 6m and 12m			
Citibank	CMLTI 200	LIBOR	17312YAB8	FALSE	Timothy Lee
Deutsche Bank	DBALT 200	1mL + 19	25151XAE1	FALSE	Timothy Lee
JPMorgan	JPMAC 200	1mL + 13	46630BAA4	FALSE	Timothy Lee
RBS	OOMLT 200	1mL + 14	68402YAA4	FALSE	Timothy Lee
UBS	MABS 200	1mL + 25	57643LJR8	FALSE	Timothy Lee
HSBC	FFML 2006	1mL + 13	32028PAA3	FALSE	Timothy Lee

**Attachment #2**

**LIBOR action memo Oct 19.docx**

**Original view**

9 pages (displayed on pages 215 to 223)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation

**Date:** October 19, 2012

**Cc:** Richard Parker, Deputy Inspector General, Office of Policy, Oversight and Review  
George P. Grob, Deputy Inspector General, Office of Evaluations

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The London Interbank Offered Rate (“LIBOR”) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments, and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their

(b) (5)

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<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained.](#)"

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"

<sup>4</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>15</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>16</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

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<sup>17</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See US Securities and Exchange Commission, “[Mortgage-Backed Securities](#).” League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>18</sup> See, for example, Federal Housing Finance Agency, “[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#).”

<sup>19</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, “[New York Lender Files LIBOR Lawsuit](#)”, July 30, 2012, and Thomson Reuters, “[In re LIBOR-Based Financial Instruments Antitrust Litigation](#),” April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, “[State Regulators Widen LIBOR Investigation](#),” August 15, 2012, and BusinessWeek, “[US LIBOR Probers Said to Seek London Trader Interviews](#),” September 27, 2012.

**Attachment #3**

**Appendix.docx**

**Original view**

3 pages (displayed on pages 225 to 227)

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, FHFA-OIG drew on two principal sources of information.

#### LIBOR Benchmarks

First, FHFA-OIG drew from Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

FHFA-OIG also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the US Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of the LIBOR index.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, FHFA-OIG chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, FHFA-OIG assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

#### Calculation of Enterprise Losses

Second, FHFA-OIG assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. FHFA-OIG calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently-used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - FHFA-OIG assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, FHFA-OIG assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - FHFA-OIG assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009 and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e. direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. FHFA-OIG used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.
  - Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

FHFA-OIG calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. FHFA-OIG assumed reported figures remained constant within each quarter. FHFA-OIG included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

FHFA-OIG believes that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, FHFA-OIG did not incorporate such factors into this analysis.

### **Limitations of FHFA-OIG's Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. FHFA-OIG acknowledges the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this "rough and ready" analysis does indicate that the accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfaoig.gov](mailto:timothy.lee@fhfaoig.gov).

## **Cover memo - is this what you had in mind?**

---

**Item ID:** 32111  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** Cover memo - is this what you had in mind?  
**Sent:** October 19, 2012 2:53 PM  
**Received:** October 19, 2012 2:53 PM

----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR cover memo.docx**

**Original view**

1 page



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 22, 2012

(b) (5)

## **Also, changed memo**

---

**Item ID:** 32112  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** Also, changed memo  
**Sent:** October 19, 2012 2:56 PM  
**Received:** October 19, 2012 2:56 PM

Hi Old Salt, Edits and a little restructuring (per our conversation) mostly in the Analysis section. Tim ----- Timothy Lee  
Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR action memo Oct 22.docx**

**Original view**

9 pages (displayed on pages 3 to 11)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Via:** Richard Parker, Deputy Inspector General, Office of Policy, Oversight and Review  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation

**Date:** October 22, 2012

---

The London Interbank Offered Rate (“LIBOR”) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments, and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

---

<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their

(b) (5)

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<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained.](#)"

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"

<sup>4</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.

<sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.

<sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

---

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)," July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

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<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)," July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## **FW: Also, changed memo**

---

**Item ID:** 32114  
**From:** Lee, Timothy </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9770D766B6642C4AC0F9F116D0B180D-TIMOTHY LEE>  
**To:** [REDACTED] (b) (5)  
**Subject:** FW: Also, changed memo  
**Sent:** October 19, 2012 6:50 PM  
**Received:** October 19, 2012 6:50 PM

Hi old salt,

Here is edited memo with cover note. Appendix unchanged from last nite. Will send appendix and excel later tonite.

Sent from my Windows Phone

From:

Lee, Timothy

Sent:

10/19/2012 14:56

To:

Parker, Richard

Subject:

Also, changed memo

Hi Old Salt,

Edits and a little restructuring (per our conversation) mostly in the Analysis section.

Tim

-----

Timothy Lee

Senior Policy Advisor, FHFA-OIG

202-730-2821

**Attachment #1**

**LIBOR action memo Oct 22.docx**

**Original view**

9 pages (displayed on pages 3 to 11)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Via:** Richard Parker, Deputy Inspector General, Office of Policy, Oversight and Review  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation

**Date:** October 22, 2012

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their

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<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained.](#)"

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"

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<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.

<sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.

<sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

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<sup>18</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)," July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See US Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)," July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## **FW: Cover memo - is this what you had in mind?**

**Item ID:** 32113  
**From:** Lee, Timothy </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9770D766B6642C4AC0F9F116D0B180D-TIMOTHY LEE>  
**To:** (b) (6)  
**Subject:** FW: Cover memo - is this what you had in mind?  
**Sent:** October 19, 2012 6:50 PM  
**Received:** October 19, 2012 6:50 PM

Sent from my Windows Phone

**From:**  
Lee, Timothy  
**Sent:**  
10/19/2012 14:53  
**To:**  
Parker, Richard  
**Subject:**  
Cover memo - is this what you had in mind?  
-----  
Timothy Lee  
Senior Policy Advisor, FHFA-OIG  
202-730-2821

**Attachment #1**

**LIBOR cover memo.docx**

**Original view**

1 page



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 22, 2012

(b) (5)

## RE: Contact

---

**Item ID:** 32115  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** [REDACTED] (b) (6)  
**Subject:** RE: Contact  
**Sent:** October 19, 2012 8:31 PM  
**Received:** October 19, 2012 8:31 PM

Hi Rich, Here are the other two documents. I did in fact speak to David about his SEC contact. I think the plan is to meet with them on Wednesday to trade notes. Tim From: [REDACTED] (b) (6) ] Sent: Thursday, October 18, 2012 5:36 PM To: Lee, Timothy Subject: Contact Tim, My handheld is on the fritz. Pls forward the final version of the memo with appendix and chart to this address. Sorry for the inconvenience. BTW -- did you get on the net with Bloch? He wants to run the methodology past his guy @ SEC in order to have a comfort level with it. I told him that I would abide by whatever you and he jointly recommended. Tx, Rich

**Attachment #1**

**LIBOR proposal.xlsx**

**Original view**

211 pages (displayed on pages 3 to 213)

## Cash Flow Shortfall from LIBOR Suppression

### Enterprises Variable Rate Mortgage Assets and Interest Rate Swaps

dollars in millions

Column ver	TL						
31-Mar-07	30-Jun-07	30-Sep-07	31-Dec-07	31-Mar-08	30-Jun-08	30-Sep-08	31-Dec-08
<b>Swap Notional Amounts</b>							
<b>Fannie Mae</b>							
Pay Fixed S	303,243	329,657	377,738	443,845	526,028	515,853	546,916
Less: Recei	248,916	256,902	285,885	408,658	409,181	372,555	451,081
Plus: Basis	7,601	8,401	7,001	18,026	25,626	24,761	24,560
Net Receiv	61,928	81,156	98,854	53,213	142,473	168,059	120,395
<b>Freddie Mac</b>							
Less: Rece	214,657	282,070	301,649	326,247	245,054	329,828	279,609
Plus: Pay F	284,927	380,370	409,682	425,450	411,074	452,633	404,359
Plus: Basis	473	1,093	498	17,988	32,205	82,205	82,190
Net Receiv	70,743	99,393	108,531	117,191	198,225	205,010	206,940
<b>Enterprises</b>							
Net Receiv	132,671	180,549	207,385	170,404	340,698	373,069	327,335
<b>Mortgage Related Securities on Balance Sheet</b>							
<b>Fannie Mae</b>							
Capital Ma	333,959	329,158	324,326	314,867	333,124	359,495	362,703
Estimated I	43%	42%	42%	43%	39%	41%	37%
Estimated I	143,728	139,816	136,268	134,230	130,345	146,025	132,796
<b>Freddie Mac</b>							
Fixed Rate	405,650	410,235	417,959	408,735	481,983	437,560	510,116
Variable Ra	306,486	302,929	302,854	303,727	309,815	299,316	294,646
Variable Ra	43%	42%	42%	43%	39%	41%	37%
<b>Floating Rate Liabilities on Balance Sheet</b>							
<b>Fannie Mae</b>							
Floating Rate Short Term Debt			-	4,501	4,501	4,495	7,585
Senior Floa	12,201	15,651	13,700	25,652	33,064	47,087	46,611
<b>Freddie Mac</b>							
Long-Term	24,176	25,487	25,566	23,461	27,093	24,708	13,664
Total Other	483,522	509,744	479,087	469,229	541,851	494,168	433,954
Ratio: Vari	5%	5%	5%	5%	5%	5%	3%

**Enterprises**

Estimated \	413,837	401,606	399,856	384,342	375,502	369,051	359,582
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Fed ED-LIBI	#NAME?						
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**Estimated Damages**

LIBOR Cash	#NAME?						
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LIBOR Cash	#NAME?						
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Prorated LIBOR Cash Flow Shortfall - 9/6/08 thru 9/30/08 **#NAME?**

| TL        |
|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| 31-Mar-09 | 30-Jun-09 | 30-Sep-09 | 31-Dec-09 | 31-Mar-10 | 30-Jun-10 | 30-Sep-10 | 31-Dec-10 | 31-Mar-11 |
| 620,850   | 650,447   | 435,693   | 382,600   | 315,857   | 317,259   | 296,877   | 277,227   | 270,250   |
| 549,823   | 571,802   | 340,384   | 275,417   | 229,293   | 234,901   | 233,613   | 224,177   | 214,777   |
| 19,815    | 22,200    | 11,000    | 3,225     | 3,220     | 3,020     | 2,485     | 485       | 1,565     |
| 90,842    | 100,845   | 106,309   | 110,408   | 89,784    | 85,378    | 65,749    | 53,535    | 57,038    |
| 336,207   | 284,244   | 320,458   | 271,403   | 255,940   | 349,545   | 316,574   | 324,590   | 249,793   |
| 342,747   | 401,901   | 414,776   | 382,259   | 382,145   | 386,194   | 363,668   | 394,294   | 330,015   |
| 82,090    | 51,065    | 51,615    | 52,045    | 54,070    | 53,910    | 2,775     | 2,375     | 3,375     |
| 88,630    | 168,722   | 145,933   | 162,901   | 180,275   | 90,559    | 49,869    | 72,079    | 83,597    |
| 179,472   | 269,567   | 252,242   | 273,309   | 270,059   | 175,937   | 115,618   | 125,614   | 140,635   |
| 353,172   | 369,546   | 368,389   | 352,709   | 434,532   | 391,615   | 373,018   | 361,697   | 335,762   |
| 33%       | 34%       | 34%       | 40%       | 52%       | 52%       | 53%       | 53%       | 52%       |
| 116,457   | 124,378   | 125,616   | 139,775   | 224,780   | 204,120   | 196,789   | 190,011   | 174,970   |
| 581,180   | 550,539   | 516,778   | 372,160   | 159,278   | 148,851   | 139,603   | 137,033   | 136,725   |
| 285,924   | 279,298   | 267,393   | 244,296   | 170,690   | 162,049   | 155,890   | 151,660   | 148,780   |
| 33%       | 34%       | 34%       | 40%       | 52%       | 52%       | 53%       | 53%       | 52%       |
| 3,132     | 3,102     | 3,069     | 50        | -         | -         | -         | -         | -         |
| 58,770    | 68,766    | 51,142    | 42,952    | 46,170    | 45,144    | 49,502    | 72,425    | 74,843    |
| 118,160   | 126,647   | 113,775   | 65,875    | 126,036   | 144,833   | 126,248   | 123,736   | 112,320   |
| 478,379   | 512,742   | 460,626   | 461,051   | 593,174   | 585,630   | 527,318   | 530,978   | 532,324   |
| 25%       | 25%       | 25%       | 14.3%     | 21%       | 25%       | 24%       | 23%       | 21%       |



30-Jun-11 30-Sep-11 31-Dec-11 31-Mar-12 30-Jun-12

205,084	193,882	186,757	206,307	229,227
161,151	179,808	229,695	250,322	265,593
2,552	6,997	9,622	18,673	20,922
46,485	21,071	(33,316)	(25,342)	(15,444)

215,758	220,668	211,808	248,453	260,428
321,870	293,683	289,335	296,573	292,660
3,275	2,275	2,750	2,400	2,350
109,387	75,290	80,277	50,520	34,582

155,872	96,361	46,961	25,178	19,138
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326,384	318,353	310,143	296,886	285,982
52%	52%	53%	54%	55%
169,673	166,610	165,685	160,482	158,349

133,048	128,918	121,676	114,306	106,577
144,053	141,548	139,556	134,484	132,225
52%	52%	53%	54%	55%

70,914	63,391	72,275	73,551	77,403
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106,778	107,422	107,240	104,330	96,962
506,059	509,108	512,871	494,455	459,537
21%	21%	21%	21%	21%

136,034	137,345	125,726	117,085	116,208
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#NAME?	#NAME?	#NAME?	#NAME?	#NAME?
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#NAME?	#NAME?	#NAME?	#NAME?	#NAME?
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Federal  
Reserve  
ED  
Deposits  
Less  
LIBOR, 1  
month  
tenor

**4-Jan-00 through 14-Jun-07**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**15-jun-07 through 7-Sep-08**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**6-sep-08 through 27-jun-12**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

Date	1 month			Date	3 month	
	1 month LIBOR	Fed ED Deposit	1 month Spread		3 month LIBOR	Fed ED Deposit
4-Jan-00	#NAME?	#NAME?	#NAME?	4-Jan-00	#NAME?	#NAME?
5-Jan-00	#NAME?	#NAME?	#NAME?	5-Jan-00	#NAME?	#NAME?
6-Jan-00	#NAME?	#NAME?	#NAME?	6-Jan-00	#NAME?	#NAME?
7-Jan-00	#NAME?	#NAME?	#NAME?	7-Jan-00	#NAME?	#NAME?
10-Jan-00	#NAME?	#NAME?	#NAME?	10-Jan-00	#NAME?	#NAME?
11-Jan-00	#NAME?	#NAME?	#NAME?	11-Jan-00	#NAME?	#NAME?
12-Jan-00	#NAME?	#NAME?	#NAME?	12-Jan-00	#NAME?	#NAME?
13-Jan-00	#NAME?	#NAME?	#NAME?	13-Jan-00	#NAME?	#NAME?
14-Jan-00	#NAME?	#NAME?	#NAME?	14-Jan-00	#NAME?	#NAME?
18-Jan-00	#NAME?	#NAME?	#NAME?	18-Jan-00	#NAME?	#NAME?
19-Jan-00	#NAME?	#NAME?	#NAME?	19-Jan-00	#NAME?	#NAME?
20-Jan-00	#NAME?	#NAME?	#NAME?	20-Jan-00	#NAME?	#NAME?
21-Jan-00	#NAME?	#NAME?	#NAME?	21-Jan-00	#NAME?	#NAME?
24-Jan-00	#NAME?	#NAME?	#NAME?	24-Jan-00	#NAME?	#NAME?
25-Jan-00	#NAME?	#NAME?	#NAME?	25-Jan-00	#NAME?	#NAME?
26-Jan-00	#NAME?	#NAME?	#NAME?	26-Jan-00	#NAME?	#NAME?
27-Jan-00	#NAME?	#NAME?	#NAME?	27-Jan-00	#NAME?	#NAME?
28-Jan-00	#NAME?	#NAME?	#NAME?	28-Jan-00	#NAME?	#NAME?





16-Jun-00	#NAME?	#NAME?	#NAME?	16-Jun-00	#NAME?	#NAME?
19-Jun-00	#NAME?	#NAME?	#NAME?	19-Jun-00	#NAME?	#NAME?
20-Jun-00	#NAME?	#NAME?	#NAME?	20-Jun-00	#NAME?	#NAME?
21-Jun-00	#NAME?	#NAME?	#NAME?	21-Jun-00	#NAME?	#NAME?
22-Jun-00	#NAME?	#NAME?	#NAME?	22-Jun-00	#NAME?	#NAME?
23-Jun-00	#NAME?	#NAME?	#NAME?	23-Jun-00	#NAME?	#NAME?
26-Jun-00	#NAME?	#NAME?	#NAME?	26-Jun-00	#NAME?	#NAME?
27-Jun-00	#NAME?	#NAME?	#NAME?	27-Jun-00	#NAME?	#NAME?
28-Jun-00	#NAME?	#NAME?	#NAME?	28-Jun-00	#NAME?	#NAME?
29-Jun-00	#NAME?	#NAME?	#NAME?	29-Jun-00	#NAME?	#NAME?
30-Jun-00	#NAME?	#NAME?	#NAME?	30-Jun-00	#NAME?	#NAME?
3-Jul-00	#NAME?	#NAME?	#NAME?	3-Jul-00	#NAME?	#NAME?
5-Jul-00	#NAME?	#NAME?	#NAME?	5-Jul-00	#NAME?	#NAME?
6-Jul-00	#NAME?	#NAME?	#NAME?	6-Jul-00	#NAME?	#NAME?
7-Jul-00	#NAME?	#NAME?	#NAME?	7-Jul-00	#NAME?	#NAME?
10-Jul-00	#NAME?	#NAME?	#NAME?	10-Jul-00	#NAME?	#NAME?
11-Jul-00	#NAME?	#NAME?	#NAME?	11-Jul-00	#NAME?	#NAME?
12-Jul-00	#NAME?	#NAME?	#NAME?	12-Jul-00	#NAME?	#NAME?
13-Jul-00	#NAME?	#NAME?	#NAME?	13-Jul-00	#NAME?	#NAME?
14-Jul-00	#NAME?	#NAME?	#NAME?	14-Jul-00	#NAME?	#NAME?
17-Jul-00	#NAME?	#NAME?	#NAME?	17-Jul-00	#NAME?	#NAME?
18-Jul-00	#NAME?	#NAME?	#NAME?	18-Jul-00	#NAME?	#NAME?
19-Jul-00	#NAME?	#NAME?	#NAME?	19-Jul-00	#NAME?	#NAME?
20-Jul-00	#NAME?	#NAME?	#NAME?	20-Jul-00	#NAME?	#NAME?
21-Jul-00	#NAME?	#NAME?	#NAME?	21-Jul-00	#NAME?	#NAME?
24-Jul-00	#NAME?	#NAME?	#NAME?	24-Jul-00	#NAME?	#NAME?
25-Jul-00	#NAME?	#NAME?	#NAME?	25-Jul-00	#NAME?	#NAME?
26-Jul-00	#NAME?	#NAME?	#NAME?	26-Jul-00	#NAME?	#NAME?
27-Jul-00	#NAME?	#NAME?	#NAME?	27-Jul-00	#NAME?	#NAME?
28-Jul-00	#NAME?	#NAME?	#NAME?	28-Jul-00	#NAME?	#NAME?
31-Jul-00	#NAME?	#NAME?	#NAME?	31-Jul-00	#NAME?	#NAME?
1-Aug-00	#NAME?	#NAME?	#NAME?	1-Aug-00	#NAME?	#NAME?
2-Aug-00	#NAME?	#NAME?	#NAME?	2-Aug-00	#NAME?	#NAME?
3-Aug-00	#NAME?	#NAME?	#NAME?	3-Aug-00	#NAME?	#NAME?
4-Aug-00	#NAME?	#NAME?	#NAME?	4-Aug-00	#NAME?	#NAME?
7-Aug-00	#NAME?	#NAME?	#NAME?	7-Aug-00	#NAME?	#NAME?
8-Aug-00	#NAME?	#NAME?	#NAME?	8-Aug-00	#NAME?	#NAME?
9-Aug-00	#NAME?	#NAME?	#NAME?	9-Aug-00	#NAME?	#NAME?
10-Aug-00	#NAME?	#NAME?	#NAME?	10-Aug-00	#NAME?	#NAME?
11-Aug-00	#NAME?	#NAME?	#NAME?	11-Aug-00	#NAME?	#NAME?
14-Aug-00	#NAME?	#NAME?	#NAME?	14-Aug-00	#NAME?	#NAME?
15-Aug-00	#NAME?	#NAME?	#NAME?	15-Aug-00	#NAME?	#NAME?
16-Aug-00	#NAME?	#NAME?	#NAME?	16-Aug-00	#NAME?	#NAME?
17-Aug-00	#NAME?	#NAME?	#NAME?	17-Aug-00	#NAME?	#NAME?
18-Aug-00	#NAME?	#NAME?	#NAME?	18-Aug-00	#NAME?	#NAME?
21-Aug-00	#NAME?	#NAME?	#NAME?	21-Aug-00	#NAME?	#NAME?
22-Aug-00	#NAME?	#NAME?	#NAME?	22-Aug-00	#NAME?	#NAME?



1-Nov-00	#NAME?	#NAME?	#NAME?	1-Nov-00	#NAME?	#NAME?
2-Nov-00	#NAME?	#NAME?	#NAME?	2-Nov-00	#NAME?	#NAME?
3-Nov-00	#NAME?	#NAME?	#NAME?	3-Nov-00	#NAME?	#NAME?
6-Nov-00	#NAME?	#NAME?	#NAME?	6-Nov-00	#NAME?	#NAME?
7-Nov-00	#NAME?	#NAME?	#NAME?	7-Nov-00	#NAME?	#NAME?
8-Nov-00	#NAME?	#NAME?	#NAME?	8-Nov-00	#NAME?	#NAME?
9-Nov-00	#NAME?	#NAME?	#NAME?	9-Nov-00	#NAME?	#NAME?
10-Nov-00	#NAME?	#NAME?	#NAME?	10-Nov-00	#NAME?	#NAME?
13-Nov-00	#NAME?	#NAME?	#NAME?	13-Nov-00	#NAME?	#NAME?
14-Nov-00	#NAME?	#NAME?	#NAME?	14-Nov-00	#NAME?	#NAME?
15-Nov-00	#NAME?	#NAME?	#NAME?	15-Nov-00	#NAME?	#NAME?
16-Nov-00	#NAME?	#NAME?	#NAME?	16-Nov-00	#NAME?	#NAME?
17-Nov-00	#NAME?	#NAME?	#NAME?	17-Nov-00	#NAME?	#NAME?
20-Nov-00	#NAME?	#NAME?	#NAME?	20-Nov-00	#NAME?	#NAME?
21-Nov-00	#NAME?	#NAME?	#NAME?	21-Nov-00	#NAME?	#NAME?
22-Nov-00	#NAME?	#NAME?	#NAME?	22-Nov-00	#NAME?	#NAME?
24-Nov-00	#NAME?	#NAME?	#NAME?	24-Nov-00	#NAME?	#NAME?
27-Nov-00	#NAME?	#NAME?	#NAME?	27-Nov-00	#NAME?	#NAME?
28-Nov-00	#NAME?	#NAME?	#NAME?	28-Nov-00	#NAME?	#NAME?
29-Nov-00	#NAME?	#NAME?	#NAME?	29-Nov-00	#NAME?	#NAME?
30-Nov-00	#NAME?	#NAME?	#NAME?	30-Nov-00	#NAME?	#NAME?
1-Dec-00	#NAME?	#NAME?	#NAME?	1-Dec-00	#NAME?	#NAME?
4-Dec-00	#NAME?	#NAME?	#NAME?	4-Dec-00	#NAME?	#NAME?
5-Dec-00	#NAME?	#NAME?	#NAME?	5-Dec-00	#NAME?	#NAME?
6-Dec-00	#NAME?	#NAME?	#NAME?	6-Dec-00	#NAME?	#NAME?
7-Dec-00	#NAME?	#NAME?	#NAME?	7-Dec-00	#NAME?	#NAME?
8-Dec-00	#NAME?	#NAME?	#NAME?	8-Dec-00	#NAME?	#NAME?
11-Dec-00	#NAME?	#NAME?	#NAME?	11-Dec-00	#NAME?	#NAME?
12-Dec-00	#NAME?	#NAME?	#NAME?	12-Dec-00	#NAME?	#NAME?
13-Dec-00	#NAME?	#NAME?	#NAME?	13-Dec-00	#NAME?	#NAME?
14-Dec-00	#NAME?	#NAME?	#NAME?	14-Dec-00	#NAME?	#NAME?
15-Dec-00	#NAME?	#NAME?	#NAME?	15-Dec-00	#NAME?	#NAME?
18-Dec-00	#NAME?	#NAME?	#NAME?	18-Dec-00	#NAME?	#NAME?
19-Dec-00	#NAME?	#NAME?	#NAME?	19-Dec-00	#NAME?	#NAME?
20-Dec-00	#NAME?	#NAME?	#NAME?	20-Dec-00	#NAME?	#NAME?
21-Dec-00	#NAME?	#NAME?	#NAME?	21-Dec-00	#NAME?	#NAME?
22-Dec-00	#NAME?	#NAME?	#NAME?	22-Dec-00	#NAME?	#NAME?
27-Dec-00	#NAME?	#NAME?	#NAME?	27-Dec-00	#NAME?	#NAME?
28-Dec-00	#NAME?	#NAME?	#NAME?	28-Dec-00	#NAME?	#NAME?
29-Dec-00	#NAME?	#NAME?	#NAME?	29-Dec-00	#NAME?	#NAME?
2-Jan-01	#NAME?	#NAME?	#NAME?	2-Jan-01	#NAME?	#NAME?
3-Jan-01	#NAME?	#NAME?	#NAME?	3-Jan-01	#NAME?	#NAME?
4-Jan-01	#NAME?	#NAME?	#NAME?	4-Jan-01	#NAME?	#NAME?
5-Jan-01	#NAME?	#NAME?	#NAME?	5-Jan-01	#NAME?	#NAME?
8-Jan-01	#NAME?	#NAME?	#NAME?	8-Jan-01	#NAME?	#NAME?
9-Jan-01	#NAME?	#NAME?	#NAME?	9-Jan-01	#NAME?	#NAME?
10-Jan-01	#NAME?	#NAME?	#NAME?	10-Jan-01	#NAME?	#NAME?

11-Jan-01	#NAME?	#NAME?	#NAME?	11-Jan-01	#NAME?	#NAME?
12-Jan-01	#NAME?	#NAME?	#NAME?	12-Jan-01	#NAME?	#NAME?
16-Jan-01	#NAME?	#NAME?	#NAME?	16-Jan-01	#NAME?	#NAME?
17-Jan-01	#NAME?	#NAME?	#NAME?	17-Jan-01	#NAME?	#NAME?
18-Jan-01	#NAME?	#NAME?	#NAME?	18-Jan-01	#NAME?	#NAME?
19-Jan-01	#NAME?	#NAME?	#NAME?	19-Jan-01	#NAME?	#NAME?
22-Jan-01	#NAME?	#NAME?	#NAME?	22-Jan-01	#NAME?	#NAME?
23-Jan-01	#NAME?	#NAME?	#NAME?	23-Jan-01	#NAME?	#NAME?
24-Jan-01	#NAME?	#NAME?	#NAME?	24-Jan-01	#NAME?	#NAME?
25-Jan-01	#NAME?	#NAME?	#NAME?	25-Jan-01	#NAME?	#NAME?
26-Jan-01	#NAME?	#NAME?	#NAME?	26-Jan-01	#NAME?	#NAME?
29-Jan-01	#NAME?	#NAME?	#NAME?	29-Jan-01	#NAME?	#NAME?
30-Jan-01	#NAME?	#NAME?	#NAME?	30-Jan-01	#NAME?	#NAME?
31-Jan-01	#NAME?	#NAME?	#NAME?	31-Jan-01	#NAME?	#NAME?
1-Feb-01	#NAME?	#NAME?	#NAME?	1-Feb-01	#NAME?	#NAME?
2-Feb-01	#NAME?	#NAME?	#NAME?	2-Feb-01	#NAME?	#NAME?
5-Feb-01	#NAME?	#NAME?	#NAME?	5-Feb-01	#NAME?	#NAME?
6-Feb-01	#NAME?	#NAME?	#NAME?	6-Feb-01	#NAME?	#NAME?
7-Feb-01	#NAME?	#NAME?	#NAME?	7-Feb-01	#NAME?	#NAME?
8-Feb-01	#NAME?	#NAME?	#NAME?	8-Feb-01	#NAME?	#NAME?
9-Feb-01	#NAME?	#NAME?	#NAME?	9-Feb-01	#NAME?	#NAME?
12-Feb-01	#NAME?	#NAME?	#NAME?	12-Feb-01	#NAME?	#NAME?
13-Feb-01	#NAME?	#NAME?	#NAME?	13-Feb-01	#NAME?	#NAME?
14-Feb-01	#NAME?	#NAME?	#NAME?	14-Feb-01	#NAME?	#NAME?
15-Feb-01	#NAME?	#NAME?	#NAME?	15-Feb-01	#NAME?	#NAME?
16-Feb-01	#NAME?	#NAME?	#NAME?	16-Feb-01	#NAME?	#NAME?
20-Feb-01	#NAME?	#NAME?	#NAME?	20-Feb-01	#NAME?	#NAME?
21-Feb-01	#NAME?	#NAME?	#NAME?	21-Feb-01	#NAME?	#NAME?
22-Feb-01	#NAME?	#NAME?	#NAME?	22-Feb-01	#NAME?	#NAME?
23-Feb-01	#NAME?	#NAME?	#NAME?	23-Feb-01	#NAME?	#NAME?
26-Feb-01	#NAME?	#NAME?	#NAME?	26-Feb-01	#NAME?	#NAME?
27-Feb-01	#NAME?	#NAME?	#NAME?	27-Feb-01	#NAME?	#NAME?
28-Feb-01	#NAME?	#NAME?	#NAME?	28-Feb-01	#NAME?	#NAME?
1-Mar-01	#NAME?	#NAME?	#NAME?	1-Mar-01	#NAME?	#NAME?
2-Mar-01	#NAME?	#NAME?	#NAME?	2-Mar-01	#NAME?	#NAME?
5-Mar-01	#NAME?	#NAME?	#NAME?	5-Mar-01	#NAME?	#NAME?
6-Mar-01	#NAME?	#NAME?	#NAME?	6-Mar-01	#NAME?	#NAME?
7-Mar-01	#NAME?	#NAME?	#NAME?	7-Mar-01	#NAME?	#NAME?
8-Mar-01	#NAME?	#NAME?	#NAME?	8-Mar-01	#NAME?	#NAME?
9-Mar-01	#NAME?	#NAME?	#NAME?	9-Mar-01	#NAME?	#NAME?
12-Mar-01	#NAME?	#NAME?	#NAME?	12-Mar-01	#NAME?	#NAME?
13-Mar-01	#NAME?	#NAME?	#NAME?	13-Mar-01	#NAME?	#NAME?
14-Mar-01	#NAME?	#NAME?	#NAME?	14-Mar-01	#NAME?	#NAME?
15-Mar-01	#NAME?	#NAME?	#NAME?	15-Mar-01	#NAME?	#NAME?
16-Mar-01	#NAME?	#NAME?	#NAME?	16-Mar-01	#NAME?	#NAME?
19-Mar-01	#NAME?	#NAME?	#NAME?	19-Mar-01	#NAME?	#NAME?
20-Mar-01	#NAME?	#NAME?	#NAME?	20-Mar-01	#NAME?	#NAME?



#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?
1-Jun-01	#NAME?	#NAME?	#NAME?	1-Jun-01	#NAME?	#NAME?
4-Jun-01	#NAME?	#NAME?	#NAME?	4-Jun-01	#NAME?	#NAME?
5-Jun-01	#NAME?	#NAME?	#NAME?	5-Jun-01	#NAME?	#NAME?
6-Jun-01	#NAME?	#NAME?	#NAME?	6-Jun-01	#NAME?	#NAME?
7-Jun-01	#NAME?	#NAME?	#NAME?	7-Jun-01	#NAME?	#NAME?
8-Jun-01	#NAME?	#NAME?	#NAME?	8-Jun-01	#NAME?	#NAME?
11-Jun-01	#NAME?	#NAME?	#NAME?	11-Jun-01	#NAME?	#NAME?
12-Jun-01	#NAME?	#NAME?	#NAME?	12-Jun-01	#NAME?	#NAME?
13-Jun-01	#NAME?	#NAME?	#NAME?	13-Jun-01	#NAME?	#NAME?
14-Jun-01	#NAME?	#NAME?	#NAME?	14-Jun-01	#NAME?	#NAME?
15-Jun-01	#NAME?	#NAME?	#NAME?	15-Jun-01	#NAME?	#NAME?
18-Jun-01	#NAME?	#NAME?	#NAME?	18-Jun-01	#NAME?	#NAME?
19-Jun-01	#NAME?	#NAME?	#NAME?	19-Jun-01	#NAME?	#NAME?
20-Jun-01	#NAME?	#NAME?	#NAME?	20-Jun-01	#NAME?	#NAME?
21-Jun-01	#NAME?	#NAME?	#NAME?	21-Jun-01	#NAME?	#NAME?
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USD3MTD156N		USD1MTD156N		DED1		DED3	
lin	Percent	lin	Percent	lin	Percent	lin	Percent
D	Daily	D	Daily	D	Daily	D	Daily
1/1/2000	1986-01-02	1/1/2000	1986-01-02	1/1/2000	1971-01-04	1/1/2000	1971-01-04 to 2012-09
<a href="#">3-Month London Inter</a>		<a href="#">1-Month London Inter</a>		<a href="#">1-Month Eurodollar De</a>		<a href="#">3-Month Eurodollar Deposit Rate</a>	
British Bankers' Associ		British Bankers' Associ		Board of Governors of		Board of Governors of the Federal	
date	value	date	value	date	value	date	value
1/4/2000	6.0	1/4/2000	5.8	1/3/2000	5.7	1/3/2000	5.9
1/5/2000	6.0	1/5/2000	5.8	1/4/2000	5.7	1/4/2000	5.9
1/6/2000	6.0	1/6/2000	5.8	1/5/2000	5.7	1/5/2000	5.9
1/7/2000	6.0	1/7/2000	5.8	1/6/2000	5.7	1/6/2000	5.9
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2/4/2000	6.1	2/4/2000	5.9	2/3/2000	5.8	2/3/2000	6.0
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2/8/2000	6.1	2/8/2000	5.9	2/7/2000	5.8	2/7/2000	6.0
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2/8/2001	5.4	2/8/2001	5.6	#####	5.7	#####	5.5
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1/7/2002	1.9	1/7/2002	1.9	#####	1.9	#####	1.8
1/8/2002	1.8	1/8/2002	1.8	#####	1.9	#####	1.8



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#####	2.0	#####	1.9	3/4/2002	1.8	3/4/2002	1.8
#####	2.0	#####	1.9	3/5/2002	1.8	3/5/2002	1.8
4/2/2002	2.0	4/2/2002	1.9	3/6/2002	1.8	3/6/2002	1.8
4/3/2002	2.0	4/3/2002	1.9	3/7/2002	1.8	3/7/2002	1.8
4/4/2002	2.0	4/4/2002	1.9	3/8/2002	1.8	3/8/2002	1.9
4/5/2002	2.0	4/5/2002	1.9	#####	1.8	#####	1.9
4/8/2002	2.0	4/8/2002	1.9	#####	1.8	#####	1.9
4/9/2002	2.0	4/9/2002	1.9	#####	1.8	#####	1.9
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#####	2.0	#####	1.9	#####	1.9	#####	1.9
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#####	1.9	#####	1.8	4/2/2002	1.8	4/2/2002	2.0
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5/1/2002	1.9	5/1/2002	1.8	4/4/2002	1.8	4/4/2002	1.9
5/2/2002	1.9	5/2/2002	1.8	4/5/2002	1.8	4/5/2002	1.9
5/3/2002	1.9	5/3/2002	1.8	4/8/2002	1.8	4/8/2002	1.9
5/7/2002	1.9	5/7/2002	1.8	4/9/2002	1.8	4/9/2002	1.9
5/8/2002	1.9	5/8/2002	1.8	#####	1.8	#####	1.9
5/9/2002	1.9	5/9/2002	1.8	#####	1.8	#####	1.9
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#####	1.4	#####	1.4	#####	1.3	#####	1.4
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1/3/2003	1.4	1/3/2003	1.4	#####	#N/A	#####	#N/A
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1/7/2003	1.4	1/7/2003	1.4	#####	1.4	#####	1.4
1/8/2003	1.4	1/8/2003	1.4	#####	1.4	#####	1.4
1/9/2003	1.4	1/9/2003	1.4	#####	1.4	#####	1.4
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#####	1.4	#####	1.4	#####	1.4	#####	1.4
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2/4/2003	1.4	2/4/2003	1.3	#####	1.3	#####	1.3
2/5/2003	1.3	2/5/2003	1.3	#####	1.3	#####	1.3
2/6/2003	1.4	2/6/2003	1.3	1/1/2003	#N/A	1/1/2003	#N/A
2/7/2003	1.4	2/7/2003	1.3	1/2/2003	1.3	1/2/2003	1.3
#####	1.3	#####	1.3	1/3/2003	1.3	1/3/2003	1.3
#####	1.4	#####	1.3	1/6/2003	1.3	1/6/2003	1.3
#####	1.3	#####	1.3	1/7/2003	1.3	1/7/2003	1.3
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3/4/2003	1.3	3/4/2003	1.3	#####	1.3	#####	1.3
3/5/2003	1.3	3/5/2003	1.3	#####	1.3	#####	1.3
3/6/2003	1.3	3/6/2003	1.3	#####	1.3	#####	1.3
3/7/2003	1.3	3/7/2003	1.3	#####	1.3	#####	1.3
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#####	1.3	#####	1.3	2/7/2003	1.3	2/7/2003	1.3
#####	1.3	#####	1.3	#####	1.3	#####	1.3
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#####	1.3	#####	1.3	#####	1.3	#####	1.3
#####	1.3	#####	1.3	#####	1.3	#####	1.3
#####	1.3	#####	1.3	#####	1.3	#####	1.3
4/1/2003	1.3	4/1/2003	1.3	#####	1.3	#####	1.3
4/2/2003	1.3	4/2/2003	1.3	#####	1.3	#####	1.3
4/3/2003	1.3	4/3/2003	1.3	#####	1.3	#####	1.3
4/4/2003	1.3	4/4/2003	1.3	#####	1.3	#####	1.3
4/7/2003	1.3	4/7/2003	1.3	#####	1.3	#####	1.3
4/8/2003	1.3	4/8/2003	1.3	3/3/2003	1.3	3/3/2003	1.3
4/9/2003	1.3	4/9/2003	1.3	3/4/2003	1.3	3/4/2003	1.3
#####	1.3	#####	1.3	3/5/2003	1.3	3/5/2003	1.3
#####	1.3	#####	1.3	3/6/2003	1.3	3/6/2003	1.3
#####	1.3	#####	1.3	3/7/2003	1.2	3/7/2003	1.2
#####	1.3	#####	1.3	#####	1.2	#####	1.2
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#####	1.3	#####	1.3	#####	1.2	#####	1.2
#####	1.3	#####	1.3	#####	1.2	#####	1.2
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#####	1.3	#####	1.3	#####	1.2	#####	1.2
#####	1.3	#####	1.3	#####	1.3	#####	1.2
#####	1.3	#####	1.3	#####	1.3	#####	1.2



7/8/2003	1.1	7/8/2003	1.1	#####	1.3	#####	1.2
7/9/2003	1.1	7/9/2003	1.1	#####	1.3	#####	1.2
#####	1.1	#####	1.1	#####	1.3	#####	1.2
#####	1.1	#####	1.1	#####	1.3	#####	1.2
#####	1.1	#####	1.1	6/2/2003	1.3	6/2/2003	1.2
#####	1.1	#####	1.1	6/3/2003	1.3	6/3/2003	1.2
#####	1.1	#####	1.1	6/4/2003	1.3	6/4/2003	1.2
#####	1.1	#####	1.1	6/5/2003	1.2	6/5/2003	1.1
#####	1.1	#####	1.1	6/6/2003	1.2	6/6/2003	1.1
#####	1.1	#####	1.1	6/9/2003	1.2	6/9/2003	1.1
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#####	1.1	#####	1.1	#####	1.0	#####	0.9
8/1/2003	1.1	8/1/2003	1.1	#####	1.0	#####	0.9
8/4/2003	1.1	8/4/2003	1.1	#####	1.0	#####	0.9
8/5/2003	1.1	8/5/2003	1.1	#####	0.9	#####	0.9
8/6/2003	1.1	8/6/2003	1.1	#####	0.9	#####	0.9
8/7/2003	1.1	8/7/2003	1.1	#####	1.1	#####	1.0
8/8/2003	1.1	8/8/2003	1.1	#####	1.1	#####	1.0
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#####	1.1	#####	1.1	7/3/2003	1.1	7/3/2003	1.1
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#####	1.1	#####	1.1	7/9/2003	1.1	7/9/2003	1.0
#####	1.1	#####	1.1	#####	1.0	#####	1.0
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9/1/2003	1.1	9/1/2003	1.1	#####	1.0	#####	1.0
9/2/2003	1.1	9/2/2003	1.1	#####	1.0	#####	1.1
9/3/2003	1.1	9/3/2003	1.1	#####	1.0	#####	1.0
9/4/2003	1.1	9/4/2003	1.1	#####	1.0	#####	1.0
9/5/2003	1.1	9/5/2003	1.1	#####	1.0	#####	1.0
9/8/2003	1.1	9/8/2003	1.1	#####	1.0	#####	1.0
9/9/2003	1.1	9/9/2003	1.1	#####	1.0	#####	1.0
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4/2/2004	1.1	4/2/2004	1.1	#####	#N/A	#####	#N/A
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4/7/2004	1.1	4/7/2004	1.1	#####	1.0	#####	1.1
4/8/2004	1.1	4/8/2004	1.1	#####	1.0	#####	1.0
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5/4/2004	1.2	5/4/2004	1.1	#####	1.0	#####	1.0
5/5/2004	1.2	5/5/2004	1.1	#####	1.0	#####	1.0
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5/7/2004	1.2	5/7/2004	1.1	#####	1.0	#####	1.0
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6/2/2004	1.3	6/2/2004	1.1	4/9/2004	#N/A	4/9/2004	#N/A
6/3/2004	1.4	6/3/2004	1.2	#####	1.0	#####	1.1
6/4/2004	1.4	6/4/2004	1.2	#####	1.0	#####	1.1
6/7/2004	1.4	6/7/2004	1.2	#####	1.0	#####	1.1
6/8/2004	1.4	6/8/2004	1.2	#####	1.0	#####	1.1
6/9/2004	1.4	6/9/2004	1.2	#####	1.0	#####	1.1
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2/2/2005	2.8	2/2/2005	2.6	#####	2.3	#####	2.4
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2/4/2005	2.8	2/4/2005	2.6	#####	2.3	#####	2.4
2/7/2005	2.8	2/7/2005	2.6	#####	2.3	#####	2.4
2/8/2005	2.8	2/8/2005	2.6	#####	2.3	#####	2.4
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#####	2.8	#####	2.6	#####	2.3	#####	2.5
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#####	2.9	#####	2.7	#####	2.3	#####	2.5
3/1/2005	2.9	3/1/2005	2.7	#####	2.3	#####	2.5
3/2/2005	2.9	3/2/2005	2.7	1/3/2005	2.3	1/3/2005	2.5
3/3/2005	3.0	3/3/2005	2.7	1/4/2005	2.3	1/4/2005	2.5
3/4/2005	3.0	3/4/2005	2.8	1/5/2005	2.3	1/5/2005	2.5
3/7/2005	3.0	3/7/2005	2.8	1/6/2005	2.4	1/6/2005	2.6

3/8/2005	3.0	3/8/2005	2.8	1/7/2005	2.4	1/7/2005	2.6
3/9/2005	3.0	3/9/2005	2.8	#####	2.4	#####	2.6
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4/1/2005	3.1	4/1/2005	2.9	#####	2.5	#####	2.7
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4/5/2005	3.1	4/5/2005	2.9	2/2/2005	2.5	2/2/2005	2.7
4/6/2005	3.1	4/6/2005	2.9	2/3/2005	2.5	2/3/2005	2.7
4/7/2005	3.1	4/7/2005	2.9	2/4/2005	2.5	2/4/2005	2.7
4/8/2005	3.1	4/8/2005	2.9	2/7/2005	2.5	2/7/2005	2.7
#####	3.1	#####	2.9	2/8/2005	2.5	2/8/2005	2.7
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5/3/2005	3.2	5/3/2005	3.1	3/1/2005	2.7	3/1/2005	2.9
5/4/2005	3.2	5/4/2005	3.1	3/2/2005	2.7	3/2/2005	2.9
5/5/2005	3.2	5/5/2005	3.1	3/3/2005	2.7	3/3/2005	2.9
5/6/2005	3.2	5/6/2005	3.1	3/4/2005	2.7	3/4/2005	2.9
5/9/2005	3.3	5/9/2005	3.1	3/7/2005	2.7	3/7/2005	2.9
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8/8/2005	3.8	8/8/2005	3.6	6/3/2005	3.1	6/3/2005	3.3
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7/6/2006	5.5	7/6/2006	5.3	#####	5.0	#####	5.1
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8/1/2006	5.5	8/1/2006	5.4	#####	5.1	#####	5.2
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8/8/2006	5.4	8/8/2006	5.4	#####	5.1	#####	5.2
8/9/2006	5.4	8/9/2006	5.3	#####	5.1	#####	5.2
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9/1/2006	5.4	9/1/2006	5.3	#####	5.3	#####	5.4













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2/7/2008	3.1	2/7/2008	3.2	#####	4.7	#####	4.9
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3/5/2008	3.0	3/5/2008	3.1	#####	5.5	#####	5.3
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4/3/2008	2.7	4/3/2008	2.7	#####	4.7	#####	4.9
4/4/2008	2.7	4/4/2008	2.7	1/1/2008	#N/A	1/1/2008	#N/A
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4/8/2008	2.7	4/8/2008	2.7	1/3/2008	4.6	1/3/2008	4.8
4/9/2008	2.7	4/9/2008	2.7	1/4/2008	4.6	1/4/2008	4.8
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5/2/2008	2.8	5/2/2008	2.7	#####	3.3	#####	3.3
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5/9/2008	2.7	5/9/2008	2.6	2/4/2008	3.3	2/4/2008	3.2
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6/2/2008	2.7	6/2/2008	2.5	#####	3.2	#####	3.1
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6/5/2008	2.7	6/5/2008	2.4	#####	3.2	#####	3.1
6/6/2008	2.7	6/6/2008	2.4	#####	3.2	#####	3.1
6/9/2008	2.7	6/9/2008	2.4	3/3/2008	3.1	3/3/2008	3.1
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7/2/2008	2.8	7/2/2008	2.5	#####	2.8	#####	2.8
7/3/2008	2.8	7/3/2008	2.5	#####	2.9	#####	2.9
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7/9/2008	2.8	7/9/2008	2.5	4/2/2008	3.0	4/2/2008	3.0
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9/5/2008	2.8	9/5/2008	2.5	#####	2.6	#####	2.9
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9/9/2008	2.8	9/9/2008	2.5	6/2/2008	2.6	6/2/2008	2.9
#####	2.8	#####	2.5	6/3/2008	2.6	6/3/2008	2.9
#####	2.8	#####	2.5	6/4/2008	2.6	6/4/2008	2.9
#####	2.8	#####	2.5	6/5/2008	2.6	6/5/2008	2.9
#####	2.8	#####	2.5	6/6/2008	2.7	6/6/2008	2.9
#####	2.9	#####	2.7	6/9/2008	2.7	6/9/2008	2.9
#####	3.1	#####	3.0	#####	2.7	#####	2.9

#####	3.2	#####	3.2	#####	2.7	#####	2.9
#####	3.2	#####	3.2	#####	2.7	#####	3.0
#####	3.2	#####	3.2	#####	2.7	#####	3.0
#####	3.2	#####	3.2	#####	2.8	#####	3.1
#####	3.5	#####	3.4	#####	2.7	#####	3.1
#####	3.8	#####	3.7	#####	2.7	#####	3.0
#####	3.8	#####	3.7	#####	2.7	#####	3.0
#####	3.9	#####	3.7	#####	2.7	#####	3.0
#####	4.1	#####	3.9	#####	2.7	#####	3.0
#####	4.2	#####	4.0	#####	2.7	#####	3.0
#####	4.2	#####	4.0	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.6	#####	3.0
#####	4.5	#####	4.3	7/1/2008	2.7	7/1/2008	3.0
#####	4.8	#####	4.5	7/2/2008	2.7	7/2/2008	3.0
#####	4.8	#####	4.6	7/3/2008	2.7	7/3/2008	3.0
#####	4.8	#####	4.6	7/4/2008	#N/A	7/4/2008	#N/A
#####	4.6	#####	4.5	7/7/2008	2.7	7/7/2008	3.0
#####	4.6	#####	4.4	7/8/2008	2.7	7/8/2008	3.0
#####	4.5	#####	4.3	7/9/2008	2.7	7/9/2008	3.0
#####	4.4	#####	4.2	#####	2.7	#####	3.0
#####	4.1	#####	3.8	#####	2.7	#####	3.0
#####	3.8	#####	3.5	#####	2.7	#####	3.0
#####	3.5	#####	3.3	#####	2.7	#####	3.0
#####	3.5	#####	3.3	#####	2.7	#####	3.0
#####	3.5	#####	3.2	#####	2.7	#####	3.0
#####	3.5	#####	3.2	#####	2.6	#####	3.0
#####	3.5	#####	3.2	#####	2.7	#####	3.0
#####	3.4	#####	3.1	#####	2.7	#####	3.0
#####	3.2	#####	2.9	#####	2.7	#####	3.0
#####	3.0	#####	2.6	#####	2.7	#####	3.0
#####	2.9	#####	2.4	#####	2.7	#####	3.0
#####	2.7	#####	2.2	#####	2.7	#####	3.0
#####	2.5	#####	2.0	#####	2.7	#####	3.0
#####	2.4	#####	1.8	#####	2.7	#####	3.0
#####	2.3	#####	1.6	#####	2.7	#####	3.0
#####	2.2	#####	1.5	8/1/2008	2.6	8/1/2008	3.0
#####	2.2	#####	1.5	8/4/2008	2.6	8/4/2008	3.0
#####	2.1	#####	1.4	8/5/2008	2.6	8/5/2008	3.0
#####	2.1	#####	1.4	8/6/2008	2.7	8/6/2008	3.0
#####	2.2	#####	1.5	8/7/2008	2.6	8/7/2008	3.0
#####	2.2	#####	1.5	8/8/2008	2.6	8/8/2008	3.0
#####	2.2	#####	1.5	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0

#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.7	#####	3.0
#####	2.2	#####	1.8	#####	2.7	#####	3.0
#####	2.2	#####	1.6	9/1/2008	#N/A	9/1/2008	#N/A
#####	2.1	#####	1.4	9/2/2008	2.6	9/2/2008	3.0
#####	2.0	#####	1.2	9/3/2008	2.6	9/3/2008	3.0
#####	1.9	#####	1.0	9/4/2008	2.6	9/4/2008	3.0
#####	1.9	#####	1.0	9/5/2008	2.6	9/5/2008	3.0
#####	1.8	#####	0.9	9/8/2008	2.7	9/8/2008	3.0
#####	1.6	#####	0.6	9/9/2008	2.7	9/9/2008	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	3.2	#####	3.2
#####	1.5	#####	0.5	#####	3.8	#####	3.8
#####	1.4	#####	0.4	#####	6.0	#####	5.0
#####	1.4	#####	0.4	#####	6.0	#####	5.0
1/2/2009	1.4	1/2/2009	0.4	#####	5.0	#####	5.0
1/5/2009	1.4	1/5/2009	0.4	#####	5.3	#####	5.0
1/6/2009	1.4	1/6/2009	0.4	#####	5.3	#####	5.0
1/7/2009	1.4	1/7/2009	0.4	#####	5.5	#####	5.0
1/8/2009	1.4	1/8/2009	0.4	#####	5.5	#####	5.0
1/9/2009	1.3	1/9/2009	0.4	#####	5.5	#####	5.0
#####	1.2	#####	0.3	#####	7.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.5	#####	6.0
#####	1.1	#####	0.4	#####	7.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	#N/A	#####	#N/A
#####	1.2	#####	0.4	#####	5.8	#####	6.0
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.0	#####	5.8
#####	1.2	#####	0.4	#####	4.3	#####	5.0

2/2/2009	1.2	2/2/2009	0.4	#####	4.0	#####	4.5
2/3/2009	1.2	2/3/2009	0.4	#####	3.8	#####	4.5
2/4/2009	1.2	2/4/2009	0.4	#####	3.8	#####	4.5
2/5/2009	1.2	2/5/2009	0.4	#####	3.8	#####	4.5
2/6/2009	1.2	2/6/2009	0.4	#####	3.8	#####	4.5
2/9/2009	1.2	2/9/2009	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	2.8	#####	4.3
#####	1.2	#####	0.5	#####	2.5	#####	4.0
#####	1.2	#####	0.5	#####	2.3	#####	3.3
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	#N/A	#####	#N/A
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	1.8	#####	3.0
3/2/2009	1.3	3/2/2009	0.5	#####	1.8	#####	3.0
3/3/2009	1.3	3/3/2009	0.5	#####	1.8	#####	3.0
3/4/2009	1.3	3/4/2009	0.5	#####	1.8	#####	3.0
3/5/2009	1.3	3/5/2009	0.5	#####	1.9	#####	3.0
3/6/2009	1.3	3/6/2009	0.5	#####	2.0	#####	3.0
3/9/2009	1.3	3/9/2009	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	#N/A	#####	#N/A
#####	1.3	#####	0.6	#####	2.8	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.5	#####	2.6	#####	3.0
#####	1.2	#####	0.5	#####	2.7	#####	3.0
#####	1.2	#####	0.5	#####	2.3	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	2.9
#####	1.2	#####	0.5	#####	1.5	#####	2.6
#####	1.2	#####	0.5	#####	1.3	#####	2.2
#####	1.2	#####	0.5	#####	1.3	#####	2.0
4/1/2009	1.2	4/1/2009	0.5	#####	1.3	#####	2.0
4/2/2009	1.2	4/2/2009	0.5	#####	1.3	#####	2.0
4/3/2009	1.2	4/3/2009	0.5	#####	1.3	#####	2.0
4/6/2009	1.2	4/6/2009	0.5	#####	1.2	#####	2.0
4/7/2009	1.1	4/7/2009	0.5	#####	1.2	#####	2.0



#####	0.6	#####	0.3	3/2/2009	0.8	3/2/2009	1.7
#####	0.6	#####	0.3	3/3/2009	0.9	3/3/2009	1.7
#####	0.6	#####	0.3	3/4/2009	0.8	3/4/2009	1.7
#####	0.6	#####	0.3	3/5/2009	0.8	3/5/2009	1.7
#####	0.6	#####	0.3	3/6/2009	0.8	3/6/2009	1.7
#####	0.6	#####	0.3	3/9/2009	0.9	3/9/2009	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
7/1/2009	0.6	7/1/2009	0.3	#####	1.0	#####	1.7
7/2/2009	0.6	7/2/2009	0.3	#####	1.0	#####	1.7
7/3/2009	0.6	7/3/2009	0.3	#####	1.0	#####	1.7
7/6/2009	0.5	7/6/2009	0.3	#####	1.0	#####	1.7
7/7/2009	0.5	7/7/2009	0.3	#####	1.0	#####	1.6
7/8/2009	0.5	7/8/2009	0.3	#####	1.0	#####	1.6
7/9/2009	0.5	7/9/2009	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.6	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	4/1/2009	1.0	4/1/2009	1.6
#####	0.5	#####	0.3	4/2/2009	1.0	4/2/2009	1.6
#####	0.5	#####	0.3	4/3/2009	1.0	4/3/2009	1.6
#####	0.5	#####	0.3	4/6/2009	1.0	4/6/2009	1.6
#####	0.5	#####	0.3	4/7/2009	1.0	4/7/2009	1.6
#####	0.5	#####	0.3	4/8/2009	1.0	4/8/2009	1.6
#####	0.5	#####	0.3	4/9/2009	0.8	4/9/2009	1.5
#####	0.5	#####	0.3	#####	#N/A	#####	#N/A
#####	0.5	#####	0.3	#####	0.8	#####	1.5
#####	0.5	#####	0.3	#####	1.0	#####	1.5
8/3/2009	0.5	8/3/2009	0.3	#####	1.0	#####	1.5
8/4/2009	0.5	8/4/2009	0.3	#####	1.0	#####	1.5
8/5/2009	0.5	8/5/2009	0.3	#####	1.0	#####	1.5
8/6/2009	0.5	8/6/2009	0.3	#####	1.0	#####	1.5
8/7/2009	0.5	8/7/2009	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	5/1/2009	0.9	5/1/2009	1.4
#####	0.4	#####	0.3	5/4/2009	0.9	5/4/2009	1.4
#####	0.4	#####	0.3	5/5/2009	0.8	5/5/2009	1.4



#####	0.3	#####	0.2	#####	0.6	#####	1.0
#####	0.3	#####	0.2	#####	0.6	#####	1.1
#####	0.3	#####	0.2	#####	0.6	#####	1.0
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.6	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.9
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	8/3/2009	0.5	8/3/2009	0.8
#####	0.3	#####	0.2	8/4/2009	0.5	8/4/2009	0.8
#####	0.3	#####	0.2	8/5/2009	0.5	8/5/2009	0.8
#####	0.3	#####	0.2	8/6/2009	0.5	8/6/2009	0.8
#####	0.3	#####	0.2	8/7/2009	0.5	8/7/2009	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.8
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.7
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.3	#####	0.2	#####	0.5	#####	0.6
#####	0.2	#####	0.2	9/1/2009	0.5	9/1/2009	0.6
#####	0.2	#####	0.2	9/2/2009	0.5	9/2/2009	0.5
#####	0.3	#####	0.2	9/3/2009	0.5	9/3/2009	0.6
#####	0.3	#####	0.2	9/4/2009	0.5	9/4/2009	0.6
#####	0.3	#####	0.2	9/7/2009	#N/A	9/7/2009	#N/A
#####	0.3	#####	0.2	9/8/2009	0.4	9/8/2009	0.6
#####	0.3	#####	0.2	9/9/2009	0.4	9/9/2009	0.6
1/4/2010	0.3	1/4/2010	0.2	#####	0.4	#####	0.6
1/5/2010	0.3	1/5/2010	0.2	#####	0.4	#####	0.6
1/6/2010	0.3	1/6/2010	0.2	#####	0.4	#####	0.5

















7/6/2011	0.2	7/6/2011	0.2	#####	0.3	#####	0.4
7/7/2011	0.2	7/7/2011	0.2	#####	0.3	#####	0.4
7/8/2011	0.2	7/8/2011	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	3/1/2011	0.3	3/1/2011	0.4
#####	0.2	#####	0.2	3/2/2011	0.3	3/2/2011	0.4
#####	0.2	#####	0.2	3/3/2011	0.3	3/3/2011	0.4
#####	0.2	#####	0.2	3/4/2011	0.3	3/4/2011	0.4
#####	0.3	#####	0.2	3/7/2011	0.3	3/7/2011	0.4
#####	0.3	#####	0.2	3/8/2011	0.3	3/8/2011	0.4
#####	0.3	#####	0.2	3/9/2011	0.3	3/9/2011	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
8/1/2011	0.3	8/1/2011	0.2	#####	0.3	#####	0.4
8/2/2011	0.3	8/2/2011	0.2	#####	0.3	#####	0.4
8/3/2011	0.3	8/3/2011	0.2	#####	0.3	#####	0.4
8/4/2011	0.3	8/4/2011	0.2	#####	0.3	#####	0.4
8/5/2011	0.3	8/5/2011	0.2	#####	0.3	#####	0.4
8/8/2011	0.3	8/8/2011	0.2	#####	0.3	#####	0.4
8/9/2011	0.3	8/9/2011	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	4/1/2011	0.3	4/1/2011	0.4
#####	0.3	#####	0.2	4/4/2011	0.3	4/4/2011	0.4
#####	0.3	#####	0.2	4/5/2011	0.3	4/5/2011	0.4
#####	0.3	#####	0.2	4/6/2011	0.3	4/6/2011	0.4
#####	0.3	#####	0.2	4/7/2011	0.3	4/7/2011	0.4
#####	0.3	#####	0.2	4/8/2011	0.3	4/8/2011	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
9/1/2011	0.3	9/1/2011	0.2	#####	0.3	#####	0.4
9/2/2011	0.3	9/2/2011	0.2	#####	0.3	#####	0.4
9/5/2011	0.3	9/5/2011	0.2	#####	0.3	#####	0.4
9/6/2011	0.3	9/6/2011	0.2	#####	0.3	#####	0.4
9/7/2011	0.3	9/7/2011	0.2	#####	0.3	#####	0.4
9/8/2011	0.3	9/8/2011	0.2	#####	0.3	#####	0.4
9/9/2011	0.3	9/9/2011	0.2	#####	0.3	#####	0.4

















I-26

[London](#)

Reserve System

Underwriter	Security purchased by the Enterprise	LIBOR-Based Interest Rate	CUSIP	Risk Factors language: Underwriters may rip you off by manipulating your reference index	Reviewer
Bank of America	BAFC 2007	1mL + 16	05952DAA1	FALSE	Timothy Lee
Barclays Capital	FHLT 2005	1mL + 26	35729PMA	FALSE	Timothy Lee
		Tied to mortgage rates, which are keyed inter alia to 6m and 12m			
Citibank	CMLTI 200	LIBOR	17312YAB8	FALSE	Timothy Lee
Deutsche Bank	DBALT 200	1mL + 19	25151XAE1	FALSE	Timothy Lee
JPMorgan	JPMAC 200	1mL + 13	46630BAA4	FALSE	Timothy Lee
RBS	OOMLT 200	1mL + 14	68402YAA4	FALSE	Timothy Lee
UBS	MABS 200	1mL + 25	57643LJR8	FALSE	Timothy Lee
HSBC	FFML 2006	1mL + 13	32028PAA3	FALSE	Timothy Lee

**Attachment #2**

**Appendix.docx**

**Original view**

3 pages (displayed on pages 215 to 217)

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, FHFA-OIG drew on two principal sources of information.

#### LIBOR Benchmarks

First, FHFA-OIG drew from Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

FHFA-OIG also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the US Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of the LIBOR index.

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#### Calculation of Enterprise Losses

Second, FHFA-OIG assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. FHFA-OIG calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently-used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - FHFA-OIG assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, FHFA-OIG assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
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  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009 and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e. direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. FHFA-OIG used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.
  - Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

FHFA-OIG calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. FHFA-OIG assumed reported figures remained constant within each quarter. FHFA-OIG included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

FHFA-OIG believes that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, FHFA-OIG did not incorporate such factors into this analysis.

### **Limitations of FHFA-OIG's Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. FHFA-OIG acknowledges the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this "rough and ready" analysis does indicate that the accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfaoig.gov](mailto:timothy.lee@fhfaoig.gov).

## **RE: Best T shirt at this year's Army Ten Miler**

---

**Item ID:** 32116  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** RE: Best T shirt at this year's Army Ten Miler  
**Sent:** October 22, 2012 8:22 PM  
**Received:** October 22, 2012 8:22 PM

Attached is the revised appendix. The SharePoint version is also revised. From: Parker, Richard Sent: Monday, October 22, 2012 6:08 PM To: Lee, Timothy Subject: RE: Best T shirt at this year's Army Ten Miler Good stuff. Yes, pls revise the appendix. Just killed ExecComp Part Duex, the wrath of exec comp. Took 7 hours but was worth it. Attached for your pleasure From: Lee, Timothy Sent: Monday, October 22, 2012 5:36 PM To: Parker, Richard Subject: RE: Best T shirt at this year's Army Ten Miler Many thanks for the kind words. (b) (6) now knows that he will be showered with toys if he shows up at an Army function and tells them he is a sailor's boy. Army footballs, Army Frisbees... Say, I just realized the LIBOR technical appendix is written in the third person. Do you want it rewritten in first person plural to match the memo? And did the cover memo meet your needs? From: Parker, Richard Sent: Monday, October 22, 2012 7:43 AM To: Lee, Timothy Subject: RE: Best T shirt at this year's Army Ten Miler Coop at his best. A great movie. The only better one, IMHO, is "The Man Who Shot Liberty Valance.". The Duke and Jimmy Stewart. BREAK Hey - you finished. I know I'm damned proud of you. Sent from my Windows Phone From: Lee, Timothy Sent: 10/22/2012 6:19 AM To: Parker, Richard Subject: RE: Best T shirt at this year's Army Ten Miler Beat my half marathon splits, as well I should have, but not by much. I spent the last two miles of the race basically trying to stave off embarrassment. But thanks for asking. You will be happy to know that Amazon Instant Video works on government laptops. Have you ever seen High Noon ? Tim From: Parker, Richard Sent: Sunday, October 21, 2012 5:14 PM To: Lee, Timothy Subject: RE: Best T shirt at this year's Army Ten Miler How did you fare, Skipper? Sent from my Windows Phone From: Lee, Timothy Sent: 10/21/2012 3:51 PM To: Parker, Richard Subject: Best T shirt at this year's Army Ten Miler Army Explosive Ordnance Disposal I am a Bomb Technician If you see me running, Try to keep up! Sent from my Windows Phone

**Attachment #1**

**Appendix.docx**

**Original view**

3 pages (displayed on pages 3 to 5)

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### LIBOR Benchmarks

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  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently-used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
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For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

# Libor

---

**Item ID:** 32126  
**From:** Timothy.Lee@fhfaig.gov  
**To:** Emerzian, Peter (b) (6)  
**Subject:** Libor  
**Sent:** October 23, 2012 9:15 AM  
**Received:** October 23, 2012 9:14 AM

Hi Peter, Following up, is there anyone at Fed IG we could reach out to? The more I consider it, the more important I think it is that we reach out to them. Tim Sent from my Windows Phone

## **FW: Fed IG**

---

**Item ID:** 32120  
**From:** Febles, Rene (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** FW: Fed IG  
**Sent:** October 23, 2012 3:29 PM  
**Received:** October 23, 2012 3:29 PM

Tim I may have a contact at Fed IG. What do you need from them? From: Emerzian, Peter Sent: Tuesday, October 23, 2012 3:19 PM To: Febles, Rene Subject: RE: Fed IG Tim can fill you in Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 2:08 PM To: Emerzian, Peter Subject: Fed IG Peter Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically? thanks

Attachment #1  
image001.png  
Image



## **Rene Febles**

Assistant Inspector General for Investigations  
Federal Housing Finance Agency  
Office of Inspector General  
400 7<sup>th</sup> Street, SW  
Washington, DC 20024  
Office (b) (6)  
Cell (b) (6)

Attachment #2

image002.png

Image



## Rene Febles

Assistant Inspector General for Investigations

Federal Housing Finance Agency

Office of Inspector General

400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office (b) (6)

Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32123  
**From:** Lee, Timothy </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9770D766B6642C4AC0F9F116D0B180D-TIMOTHY LEE>  
**To:** Febles, Rene </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4dca612235064540ac7ad51bfe748bcf-Rene Febles>  
**Subject:** RE: Fed IG  
**Sent:** October 23, 2012 6:05 PM  
**Received:** October 23, 2012 6:05 PM

Can I call you in the morning?

Sent from my Windows Phone

From:

Febles, Rene

Sent:

10/23/2012 15:29

To:

Lee, Timothy

Subject:

FW: Fed IG

Tim

I may have a contact at Fed IG. What do you need from them?

From: Emerzian, Peter

Sent: Tuesday, October 23, 2012 3:19 PM

To: Febles, Rene

Subject: RE: Fed IG

Tim can fill you in

Sent from my Windows Phone

From:

Febles, Rene

Sent:

10/23/2012 2:08 PM

To:

Emerzian, Peter

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Fed IG

Peter

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Attachment #2

image002.png

Image



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Assistant Inspector General for Investigations

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Office of Inspector General

400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office (b) (6)

Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32117  
**From:** Febles, Rene (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Fed IG  
**Sent:** October 23, 2012 6:12 PM  
**Received:** October 23, 2012 6:12 PM

Yes

Sent from my Windows Phone

From:

Lee, Timothy

Sent:

10/23/2012 6:05 PM

To:

Febles, Rene

Subject:

RE: Fed IG

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Sent from my Windows Phone

From:

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To:

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Subject:

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image002.png

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400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office (b) (6)

Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32127  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Febles, Rene </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4dca612235064540ac7ad51bfe748bcf-Rene Febles>  
**Cc:** Emerzian, Peter </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e5f50330ff35406f9fb12c708e959aeb-Peter Emerz>  
**Subject:** RE: Fed IG  
**Sent:** October 24, 2012 7:42 AM  
**Received:** October 24, 2012 7:42 AM

Hi Rene, Could you do me a favor and look through this memo? Give me a call when you are ready to talk – 202-730-2821. I am usually in about 0900. [REDACTED] (b) (5)

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]. The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement. Thanks, Tim  
From: Febles, Rene  
Sent: Tuesday, October 23, 2012 6:13 PM  
To: Lee, Timothy  
Subject: RE: Fed IG Yes Sent from my Windows Phone  
From: Lee, Timothy  
Sent: 10/23/2012 6:05 PM  
To: Febles, Rene  
Subject: RE: Fed IG Can I call you in the morning?  
Sent from my Windows Phone  
From: Febles, Rene  
Sent: 10/23/2012 15:29  
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**Attachment #1**

**LIBOR action memo Oct 22.docx**

**Original view**

9 pages (displayed on pages 3 to 11)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Via:** Richard Parker, Deputy Inspector General, Office of Policy, Oversight and Review  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation

**Date:** October 22, 2012

---

The London Interbank Offered Rate (“LIBOR”) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments, and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

---

<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their

(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained.](#)"

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"

<sup>4</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.

<sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.

<sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

---

<sup>18</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)," July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See US Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)," July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

Attachment #2

image001.png

Image



## **Rene Febles**

Assistant Inspector General for Investigations  
Federal Housing Finance Agency

Office of Inspector General

400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office (b) (6)

Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32132  
**From:** Emerzian, Peter (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Fed IG  
**Sent:** October 24, 2012 7:49 AM  
**Received:** October 24, 2012 7:49 AM

Sent from my Windows Phone

**From:**  
Lee, Timothy  
**Sent:**  
10/24/2012 6:42 AM  
**To:**  
Febles, Rene  
**Cc:**  
Emerzian, Peter  
**Subject:**  
RE: Fed IG  
Hi Rene,

Could you do me a favor and look through this memo? Give me a call when you are ready to talk â€” 202-730-2821. I am usually in about 0900.

(b) (5)

The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement.

Thanks,

Tim

**From:** Febles, Rene  
**Sent:** Tuesday, October 23, 2012 6:13 PM  
**To:** Lee, Timothy  
**Subject:** RE: Fed IG

Yes

Sent from my Windows Phone

**From:**  
Lee, Timothy  
**Sent:**  
10/23/2012 6:05 PM  
**To:**  
Febles, Rene  
**Subject:**  
RE: Fed IG

Can I call you in the morning?

Sent from my Windows Phone

**From:**  
Febles, Rene

Sent:

10/23/2012 15:29

To:

Lee, Timothy

Subject:

FW: Fed IG

Tim

I may have a contact at Fed IG. What do you need from them?

From: Emerzian, Peter

Sent: Tuesday, October 23, 2012 3:19 PM

To: Febles, Rene

Subject: RE: Fed IG

Tim can fill you in

Sent from my Windows Phone

From:

Febles, Rene

Sent:

10/23/2012 2:08 PM

To:

Emerzian, Peter

Subject:

Fed IG

Peter

Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically?

thanks

Attachment #1

image001.png

Image



## **Rene Febles**

Assistant Inspector General for Investigations

Federal Housing Finance Agency

Office of Inspector General

400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office (b) (6)

Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32130  
**From:** Emerzian, Peter (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Febles, Rene (b) (6)  
**Subject:** RE: Fed IG  
**Sent:** October 24, 2012 7:50 AM  
**Received:** October 24, 2012 7:50 AM

Tim  
Os this ready to be shared with DOJ?  
Sent from my Windows Phone  
From:  
Lee, Timothy  
Sent:  
10/24/2012 6:42 AM  
To:  
Febles, Rene  
Cc:  
Emerzian, Peter  
Subject:  
RE: Fed IG  
Hi Rene,  
Could you do me a favor and look through this memo? Give me a call when you are ready to talk â€œ 202-730-2821. I am usually in about 0900.

(b) (5)

The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement.

Thanks,

Tim

From: Febles, Rene  
Sent: Tuesday, October 23, 2012 6:13 PM  
To: Lee, Timothy  
Subject: RE: Fed IG

Yes

Sent from my Windows Phone

From:

Lee, Timothy

Sent:  
10/23/2012 6:05 PM

To:

Febles, Rene

Subject:

RE: Fed IG

Can I call you in the morning?

Sent from my Windows Phone

From:  
Febles, Rene  
Sent:  
10/23/2012 15:29  
To:

Lee, Timothy

Subject:

FW: Fed IG

Tim

I may have a contact at Fed IG. What do you need from them?

From: Emerzian, Peter

Sent: Tuesday, October 23, 2012 3:19 PM

To: Febles, Rene

Subject: RE: Fed IG

Tim can fill you in

Sent from my Windows Phone

From:

Febles, Rene

Sent:

10/23/2012 2:08 PM

To:

Emerzian, Peter

Subject:

Fed IG

Peter

Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically?

thanks

Attachment #1  
image001.png  
Image



## **Rene Febles**

Assistant Inspector General for Investigations  
Federal Housing Finance Agency  
Office of Inspector General  
400 7<sup>th</sup> Street, SW  
Washington, DC 20024  
Office (b) (6)  
Cell (b) (6)

## FW: Fed IG

---

**Item ID:** 32135  
**From:** Lee, Timothy </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9770D766B6642C4AC0F9F116D0B180D-TIMOTHY LEE>  
**To:** Parker, Richard </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** FW: Fed IG  
**Sent:** October 24, 2012 8:19 AM  
**Received:** October 24, 2012 8:19 AM

Hi Rich,  
I think the answer is yes but want to confirm with you.

Tim  
Sent from my Windows Phone

**From:**  
Emerzian, Peter  
**Sent:**  
10/24/2012 7:50

**To:**  
Lee, Timothy; Febles, Rene

**Subject:**  
RE: Fed IG

Tim  
Os this ready to be shared with DOJ?

Sent from my Windows Phone  
**From:**

Lee, Timothy  
**Sent:**  
10/24/2012 6:42 AM

**To:**  
Febles, Rene

**Cc:**  
Emerzian, Peter

**Subject:**  
RE: Fed IG

Hi Rene,  
Could you do me a favor and look through this memo? Give me a call when you are ready to talk â€œ 202-730-2821. I am usually in about 0900.

(b) (5)

The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement.

Thanks,

Tim  
**From:** Febles, Rene

**Sent:** Tuesday, October 23, 2012 6:13 PM

To: Lee, Timothy  
Subject: RE: Fed IG

Yes

Sent from my Windows Phone

From:

Lee, Timothy

Sent:

10/23/2012 6:05 PM

To:

Febles, Rene

Subject:

RE: Fed IG

Can I call you in the morning?

Sent from my Windows Phone

From:

Febles, Rene

Sent:

10/23/2012 15:29

To:

Lee, Timothy

Subject:

FW: Fed IG

Tim

I may have a contact at Fed IG. What do you need from them?

From: Emerzian, Peter

Sent: Tuesday, October 23, 2012 3:19 PM

To: Febles, Rene

Subject: RE: Fed IG

Tim can fill you in

Sent from my Windows Phone

From:

Febles, Rene

Sent:

10/23/2012 2:08 PM

To:

Emerzian, Peter

Subject:

Fed IG

Peter

Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically?

thanks

Attachment #1  
image001.png  
Image



## **Rene Febles**

Assistant Inspector General for Investigations  
Federal Housing Finance Agency  
Office of Inspector General  
400 7<sup>th</sup> Street, SW  
Washington, DC 20024  
Office (b) (6)  
Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32140  
**From:** Febles, Rene (b) (5)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov> (b) (6)  
>  
**Cc:** Emerzian, Peter (b) (6)  
**Subject:** RE: Fed IG  
**Sent:** October 24, 2012 9:18 AM  
**Received:** October 24, 2012 9:18 AM

Tim I read your memo. (b) (6) and I are available to discuss. We are ready in 15 minutes. thanks From: Lee, Timothy  
Sent: Wednesday, October 24, 2012 7:43 AM To: Febles, Rene Cc: Emerzian, Peter Subject: RE: Fed IG Hi Rene,  
Could you do me a favor and look through this memo? Give me a call when you are ready to talk – 202-730-2821. I  
am usually in about 0900. (b) (5)

[REDACTED]. The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement. Thanks, Tim From: Febles, Rene Sent: Tuesday, October 23, 2012 6:13 PM To: Lee, Timothy Subject: RE: Fed IG Yes Sent from my Windows Phone From: Lee, Timothy Sent: 10/23/2012 6:05 PM To: Febles, Rene Subject: RE: Fed IG Can I call you in the morning? Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 15:29 To: Lee, Timothy Subject: FW: Fed IG Tim I may have a contact at Fed IG. What do you need from them? From: Emerzian, Peter Sent: Tuesday, October 23, 2012 3:19 PM To: Febles, Rene Subject: RE: Fed IG Tim can fill you in Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 2:08 PM To: Emerzian, Peter Subject: Fed IG Peter Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically? thanks

Attachment #1  
image002.png  
Image



## **Rene Febles**

Assistant Inspector General for Investigations  
Federal Housing Finance Agency  
Office of Inspector General  
400 7<sup>th</sup> Street, SW  
Washington, DC 20024  
Office (b) (6)  
Cell (b) (6)

Attachment #2

image003.png

Image



## Rene Febles

Assistant Inspector General for Investigations

Federal Housing Finance Agency

Office of Inspector General

400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office (b) (6)

Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32142  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Febles, Rene </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4dca612235064540ac7ad51bfe748bcf-Rene Febles> (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=61e82b6eb7a942799b83386155b2ad80-(b) (6)>  
**Cc:** Emerzian, Peter </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e5f50330ff35406f9fb12c708e959aeb-Peter Emerz>  
**Subject:** RE: Fed IG  
**Sent:** October 24, 2012 9:18 AM  
**Received:** October 24, 2012 9:18 AM

OK if I bring my breakfast to your office? From: Febles, Rene Sent: Wednesday, October 24, 2012 9:18 AM To: Lee, Timothy; (b) (6) Cc: Emerzian, Peter Subject: RE: Fed IG Tim I read your memo. (b) (6) and I are available to discuss. We are ready in 15 minutes. thanks From: Lee, Timothy Sent: Wednesday, October 24, 2012 7:43 AM To: Febles, Rene Cc: Emerzian, Peter Subject: RE: Fed IG Hi Rene, Could you do me a favor and look through this memo? Give me a call when you are ready to talk – 202-730-2821. I am usually in about 0900. (b) (5)

(b) (6)  
(b) (6)  
(b) (6)  
(b) (6) The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement. Thanks, Tim From: Febles, Rene Sent: Tuesday, October 23, 2012 6:13 PM To: Lee, Timothy Subject: RE: Fed IG Yes Sent from my Windows Phone From: Lee, Timothy Sent: 10/23/2012 6:05 PM To: Febles, Rene Subject: RE: Fed IG Can I call you in the morning? Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 15:29 To: Lee, Timothy Subject: FW: Fed IG Tim I may have a contact at Fed IG. What do you need from them? From: Emerzian, Peter Sent: Tuesday, October 23, 2012 3:19 PM To: Febles, Rene Subject: RE: Fed IG Tim can fill you in Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 2:08 PM To: Emerzian, Peter Subject: Fed IG Peter Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically? thanks

Attachment #1  
image001.png  
Image



## **Rene Febles**

Assistant Inspector General for Investigations  
Federal Housing Finance Agency  
Office of Inspector General  
400 7<sup>th</sup> Street, SW  
Washington, DC 20024  
Office (b) (6)  
Cell (b) (6)

## RE: Fed IG

---

**Item ID:** 32143  
**From:** Febles, Rene (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, (b) (6)  
**Cc:** Emerzian, Peter (b) (6)  
**Subject:** RE: Fed IG  
**Sent:** October 24, 2012 9:20 AM  
**Received:** October 24, 2012 9:20 AM

Yes absolutely From: Lee, Timothy Sent: Wednesday, October 24, 2012 9:19 AM To: Febles, Rene; (b) (6)  
Cc: Emerzian, Peter Subject: RE: Fed IG OK if I bring my breakfast to your office? From: Febles, Rene Sent:  
Wednesday, October 24, 2012 9:18 AM To: Lee, Timothy; (b) (6) Cc: Emerzian, Peter Subject: RE: Fed IG  
Tim I read your memo. (b) (6) and I are available to discuss. We are ready in 15 minutes. thanks From: Lee, Timothy  
Sent: Wednesday, October 24, 2012 7:43 AM To: Febles, Rene Cc: Emerzian, Peter Subject: RE: Fed IG Hi Rene,  
Could you do me a favor and look through this memo? Give me a call when you are ready to talk – 202-730-2821. I  
am usually in about 0900. (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement. Thanks, Tim From: Febles, Rene Sent: Tuesday, October 23, 2012 6:13 PM To: Lee, Timothy Subject: RE: Fed IG Yes Sent from my Windows Phone From: Lee, Timothy Sent: 10/23/2012 6:05 PM To: Febles, Rene Subject: RE: Fed IG Can I call you in the morning? Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 15:29 To: Lee, Timothy Subject: FW: Fed IG Tim I may have a contact at Fed IG. What do you need from them? From: Emerzian, Peter Sent: Tuesday, October 23, 2012 3:19 PM To: Febles, Rene Subject: RE: Fed IG Tim can fill you in Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 2:08 PM To: Emerzian, Peter Subject: Fed IG Peter Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically? thanks

Attachment #1

image002.png

Image



## **Rene Febles**

Assistant Inspector General for Investigations

Federal Housing Finance Agency

Office of Inspector General

400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office: (b) (6)

Cell: (b) (6)

Attachment #2

image003.png

Image



## Rene Febles

Assistant Inspector General for Investigations

Federal Housing Finance Agency

Office of Inspector General

400 7<sup>th</sup> Street, SW

Washington, DC 20024

Office [REDACTED] (b) (6)

Cell [REDACTED] (b) (6)

# RE: FRB IG

---

**Item ID:** 32144  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=61e82b6eb7a942799b83386155b2ad80-(b) (6)>  
**Subject:** RE: FRB IG  
**Sent:** October 24, 2012 10:15 AM  
**Received:** October 24, 2012 10:15 AM

Hi (b) (6), (b) (5)  
[Redacted]  
[Redacted]  
[Redacted] (b) (5)  
[Redacted] (b) (5)  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted] (b) (5)  
[Redacted]  
[Redacted] Of course, we are always happy to help in any way we can. Thanks, Tim  
From: (b) (6) Sent: Wednesday, October 24, 2012 9:55 AM To: Lee, Timothy Subject: RE: FRB IG Great.  
From: Lee, Timothy Sent: Wednesday, October 24, 2012 9:54 AM To: (b) (6) Subject: RE: FRB IG Sure,  
you will have it before lunch From: (b) (6) Sent: Wednesday, October 24, 2012 9:51 AM To: Lee, Timothy  
Subject: FRB IG Tim, Can you draft a few sentences on who you want to meet with and what you want to get out of  
the meeting? (b) (6) Investigative Counsel Office of Inspector General Federal Housing Finance Agency 400 7 th  
Street, SW Washington, DC 20024 Telephone: (b) (6) BlackBerry: (b) (6)  
(b) (6)

**Attachment #1**

**LIBOR action memo Oct 22.docx**

**Original view**

9 pages (displayed on pages 3 to 11)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Via:** Richard Parker, Deputy Inspector General, Office of Policy, Oversight and Review  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation

**Date:** October 22, 2012

---

The London Interbank Offered Rate (“LIBOR”) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments, and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and US authorities, including the Department of Justice (“DOJ”), Barclays Bank Plc (“Barclays”) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

---

<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their

(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

(b) (5)

<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained.](#)"

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"

<sup>4</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.

<sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.

<sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

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<sup>18</sup> US Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)," July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012. p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See US Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to US dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)," July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## Greetings and Meeting Request

---

**Item ID:** 32147  
**From:** (b) (6)  
**To:** (b) (6)  
**Cc:** Lee, Timothy <Timothy.Lee@fhfaig.gov>, Febles, Rene (b) (6)  
**Subject:** Greetings and Meeting Request  
**Sent:** October 24, 2012 11:00 AM  
**Received:** October 24, 2012 11:00 AM

(b) (6) Hope all is well with you and the rest of the team at FRB-OIG. Here at FHFA-OIG in the wake of the LIBOR reports, our Senior Policy Analyst, Tim Lee has done some analysis to gauge the effect of any downward manipulation on Fannie Mae and Freddie Mac. (b) (5)

[Redacted]

[Redacted] Therefore, I wanted to reaching out to you at Fed IG, to see if we could meet with someone at the IG who has a grounding in business and finance, to share our findings and discuss their implications for the Federal Reserve. Of course, we are always happy to help in any way we can. Can you please provide me with a contact and help arrange a meeting? I have copied Rene Febles, Assistant Inspector General for Investigations at FHFA-OIG on this email. I look forward to hearing from you. Many thanks!! (b) (6) Investigative Counsel Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024  
Telephone: (b) (6) BlackBerry: (b) (6)

## FW: Fed IG

---

**Item ID:** 32150  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** FW: Fed IG  
**Sent:** October 24, 2012 11:05 AM  
**Received:** October 24, 2012 11:05 AM

Hi Old Salt, A heads up that Mike just walked into my office and asked if the LIBOR memo was in final form, because "we want to get it to Steve and get it out." Tim From: Emerzian, Peter Sent: Wednesday, October 24, 2012 7:51 AM To: Lee, Timothy; Febles, Rene Subject: RE: Fed IG Tim Os this ready to be shared with DOJ? Sent from my Windows Phone From: Lee, Timothy Sent: 10/24/2012 6:42 AM To: Febles, Rene Cc: Emerzian, Peter Subject: RE: Fed IG Hi Rene, Could you do me a favor and look through this memo? Give me a call when you are ready to talk – 202-730-2821. I am usually in about 0900. [REDACTED] (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The right person to talk to at Fed IG is someone from the business side, who is at least minimally comfortable walking through an Excel sheet or a financial statement. Thanks, Tim From: Febles, Rene Sent: Tuesday, October 23, 2012 6:13 PM To: Lee, Timothy Subject: RE: Fed IG Yes Sent from my Windows Phone From: Lee, Timothy Sent: 10/23/2012 6:05 PM To: Febles, Rene Subject: RE: Fed IG Can I call you in the morning? Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 15:29 To: Lee, Timothy Subject: FW: Fed IG Tim I may have a contact at Fed IG. What do you need from them? From: Emerzian, Peter Sent: Tuesday, October 23, 2012 3:19 PM To: Febles, Rene Subject: RE: Fed IG Tim can fill you in Sent from my Windows Phone From: Febles, Rene Sent: 10/23/2012 2:08 PM To: Emerzian, Peter Subject: Fed IG Peter Steve may have a contact. He just needs to know what is the subject area we plan on discussing with them to put us to the correct person. I know it is about Libor but do you know what specifically? thanks

Attachment #1  
image001.png  
Image



## **Rene Febles**

Assistant Inspector General for Investigations  
Federal Housing Finance Agency  
Office of Inspector General  
400 7<sup>th</sup> Street, SW  
Washington, DC 20024  
Office (b) (6)  
Cell (b) (6)

## **LIBOR: the latest and greatest**

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**Item ID:** 32152  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** LIBOR: the latest and greatest  
**Sent:** October 24, 2012 11:40 AM  
**Received:** October 24, 2012 11:40 AM

Memo with cover note Spreadsheet Appendix ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

# FW: Greetings and Meeting Request

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**Item ID:** 32154  
**From:** Lee, Timothy </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9770D766B6642C4AC0F9F116D0B180D-TIMOTHY LEE>  
**To:** Bloch, David </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** FW: Greetings and Meeting Request  
**Sent:** October 25, 2012 10:31 AM  
**Received:** October 25, 2012 10:31 AM

Sent from my Windows Phone

From:

(b) (6)

Sent:

10/24/2012 11:00

To:

(b) (6)

Cc:

Lee, Timothy; Febles, Rene

Subject:

Greetings and Meeting Request

(b) (6)

Hope all is well with you and the rest of the team at FRB-OIG.

Here at FHFA-OIG in the wake of the LIBOR reports, our Senior Policy Analyst, Tim Lee has done some analysis to gauge the effect of any downward manipulation on Fannie Mae and Freddie Mac. (b) (5)

[REDACTED]

Therefore, I wanted to reaching out to you at Fed IG, to see if we could meet with someone at the IG who has a grounding in business and finance, to share our findings and discuss their implications for the Federal Reserve. Of course,

we are always happy to help in any way we can. Can you please provide me with a contact and help arrange a meeting? I have copied Rene Febles, Assistant Inspector General for Investigations at FHFA-OIG on this email. I look forward to hearing from you. Many thanks!!

(b) (6)

Investigative Counsel  
Office of Inspector General  
Federal Housing Finance Agency

400 7 th Street, SW  
Washington, DC 20024

Telephone: (b) (6)

BlackBerry: (b) (6)

## **FW: LIBOR: the latest and greatest**

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**Item ID:** 32159  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** FW: LIBOR: the latest and greatest  
**Sent:** October 25, 2012 12:53 PM  
**Received:** October 25, 2012 12:53 PM

Skipper, I'm alright with this. I need your buy-in. Also – pls tell me what you did to index your work against the sources set forth in the end notes and links. Tx, Rich From (b) (6) Sent: Thursday, October 25, 2012 12:01 PM To: Parker, Richard Subject: RE: LIBOR: the latest and greatest Two docs are attached; the final doc is "LIBOR memos and appendix" and it contains both memos and the appendix from the links below. There is one comment bubble on the first page that needs a second look for rephrasing. I did read through everything and made minor proofing corrections, but because the final contains a number of hyperlinks I did not want to Track Change in it as many times the links go wonky. Therefore, the second doc "REDLINE" is a redline (HA, go figure) of all your original files vs the final and you can see all of the proofing edits I made. If you do not agree with something I changed, you will need to restore it in the final. Holler if you have any questions. (b) (6) From: Parker, Richard Sent: Wednesday, October 24, 2012 5:18 PM To: (b) (6) Subject: FW: LIBOR: the latest and greatest (b) (6), Here are the 3 documents about which we spoke. Many thanks for the good help. Rich Richard Parker Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6) From: Lee, Timothy Sent: Wednesday, October 24, 2012 11:41 AM To: Parker, Richard Subject: LIBOR: the latest and greatest Memo with cover note Spreadsheet Appendix ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR memos and appendix.docx**

**Original view**

14 pages (displayed on pages 3 to 16)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October 26, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to manipulation of the London Interbank Offered Rate (LIBOR). As you know, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's June 27th announcement of its agreement with Barclays. On September 6th and 11th they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The enclosed memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. In light of the fact that my staff has preliminarily estimated that the Enterprises may have suffered more than \$3 billion in such losses that would have been funded by the Department of the Treasury under the Preferred Stock Purchase Agreements, I believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of the members of my staff in this regard.



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis, Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, “[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)”, July 18, 2012.

instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting

with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

## Analysis

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S. investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

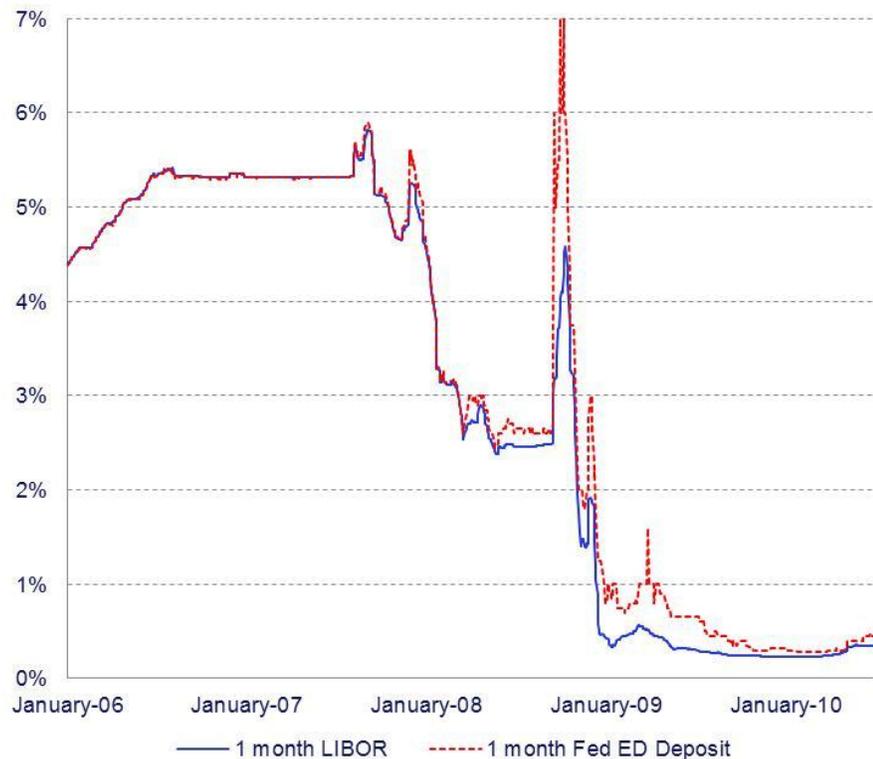
As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

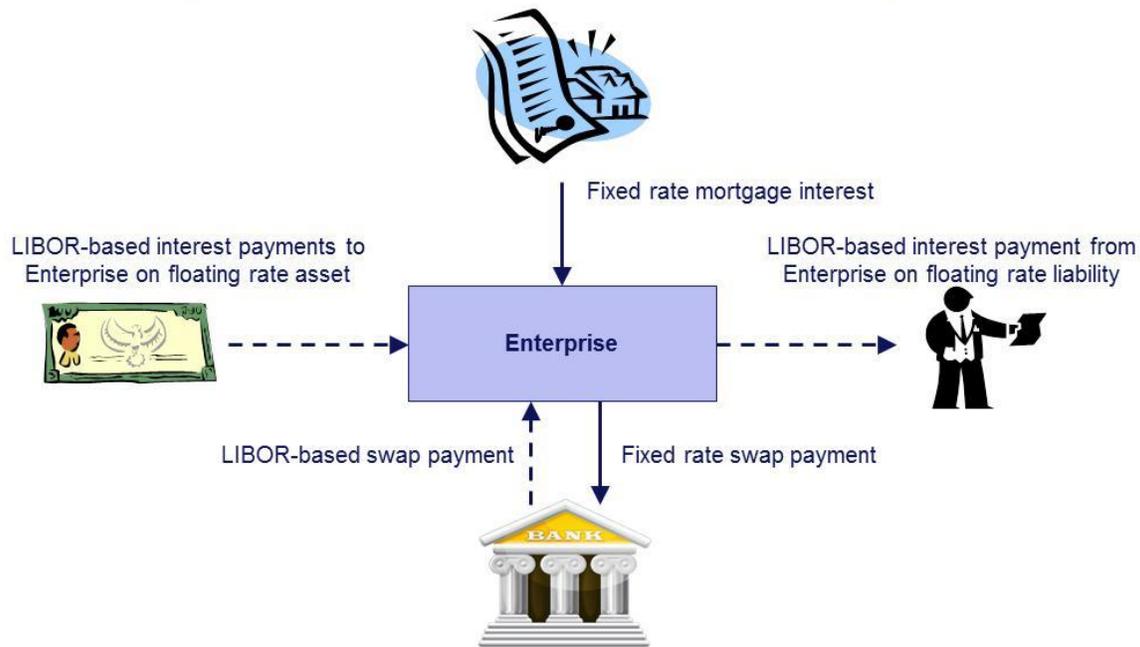
... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



**Figure 2. LIBOR-Based Payments to and From the Enterprises**



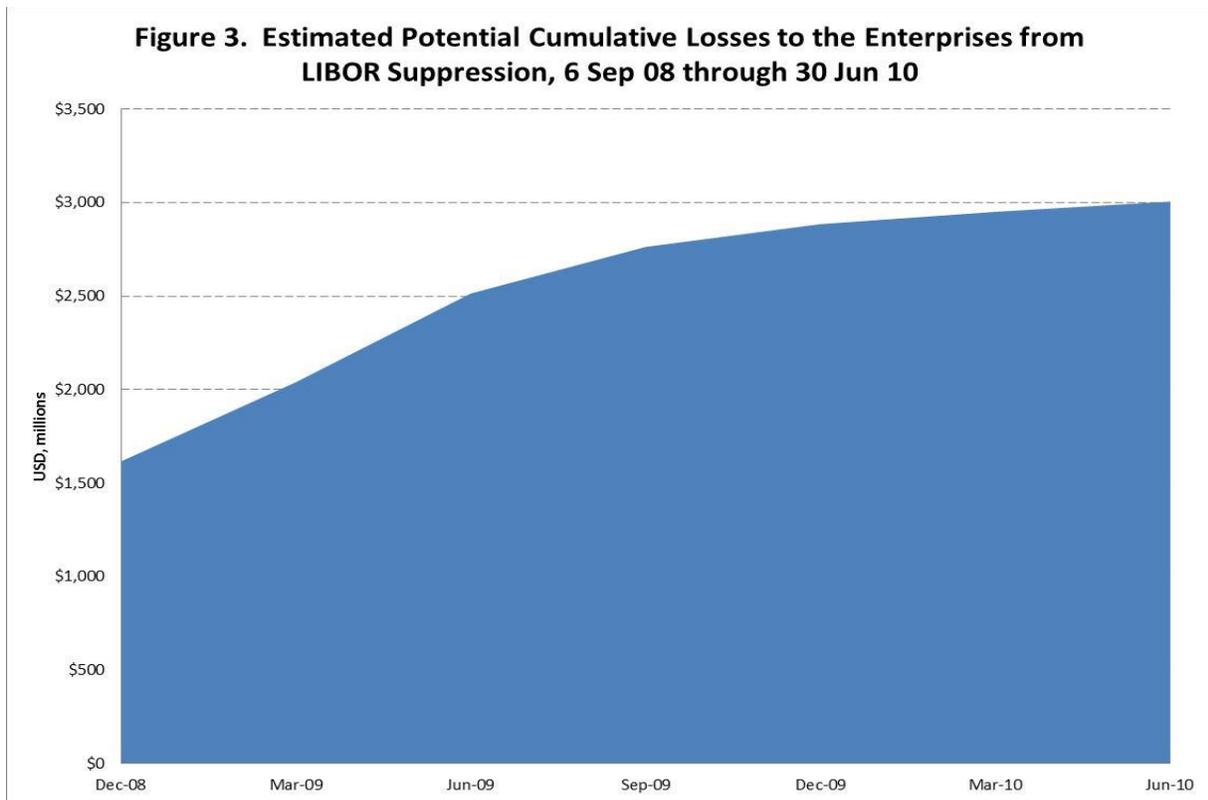
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both set LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

## Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of the LIBOR index.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

- 
- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)," July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)," September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)," January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intemp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intemp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.
- <sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012, p.2

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<sup>21</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, “[Mortgage-Backed Securities](#).” League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>22</sup> See, for example, Federal Housing Finance Agency, “[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#).”

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, “[New York Lender Files LIBOR Lawsuit](#)”, July 30, 2012, and Thomson Reuters, “[In re LIBOR-Based Financial Instruments Antitrust Litigation](#),” April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, “[State Regulators Widen LIBOR Investigation](#),” August 15, 2012, and BusinessWeek, “[US LIBOR Probers Said to Seek London Trader Interviews](#),” September 27, 2012.

**Attachment #2**

**REDLINE.docx**

**Original view**

14 pages (displayed on pages 18 to 31)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October ~~22~~26, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to manipulation of the London Interbank Offered Rate (LIBOR). As you know, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's June 27th announcement of its agreement with Barclays. On September 6th and 11th they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The enclosed memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. In light of the fact that my staff has preliminarily estimated that the Enterprises may have suffered more than \$3 billion in such losses ~~which that~~ would have been funded by the Department of the Treasury under the Preferred Stock Purchase Agreements, I believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of the members of my staff in this regard.

Comment [pam1]: awkward; perhaps rephrase to "preliminary estimates showing"



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (~~“(LIBOR)”~~) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments, and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and ~~“U.S.”~~ authorities, including the Department of Justice (~~“(DOJ)”~~), Barclays Bank Plc (~~“(Barclays)”~~) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for

financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, “[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)”, July 18, 2012.

market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### Analysis

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions, and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR exceeded Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, “effectively, these two rates should be the same as they are the same instrument.”<sup>13</sup>

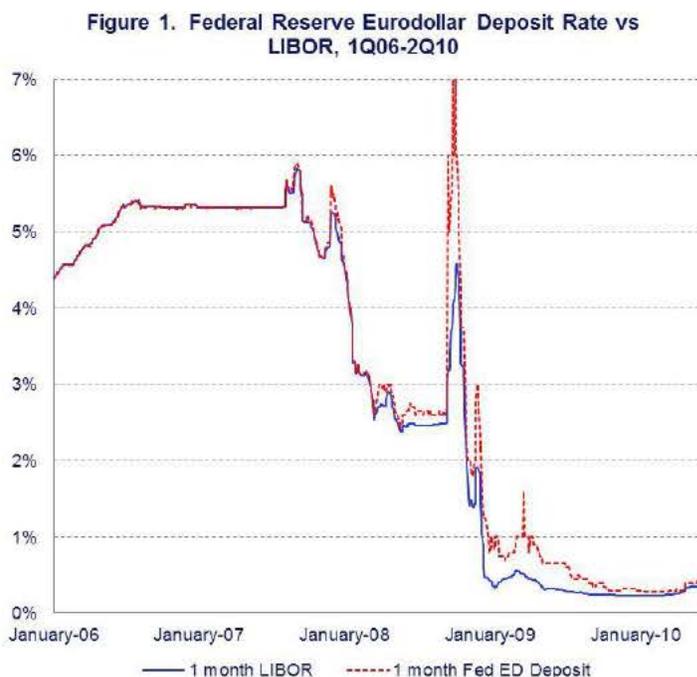
However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S. investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds’ bankruptcy filings at the end of July.<sup>16</sup>

As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions’ LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ’s statement of facts regarding Barclays’ admitted LIBOR manipulation, which reads in part:

... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays’s high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays’s Dollar LIBOR submissions be

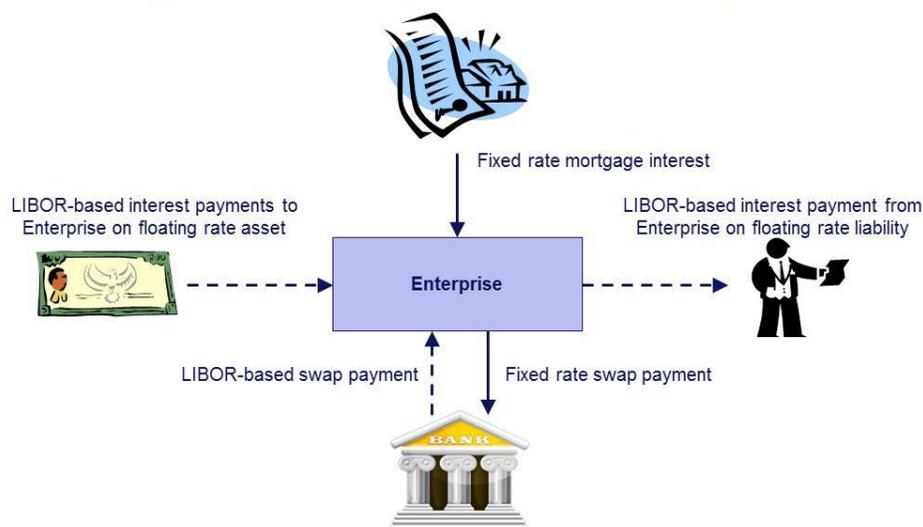
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lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

Figure 2. LIBOR-Based Payments to and From the Enterprises



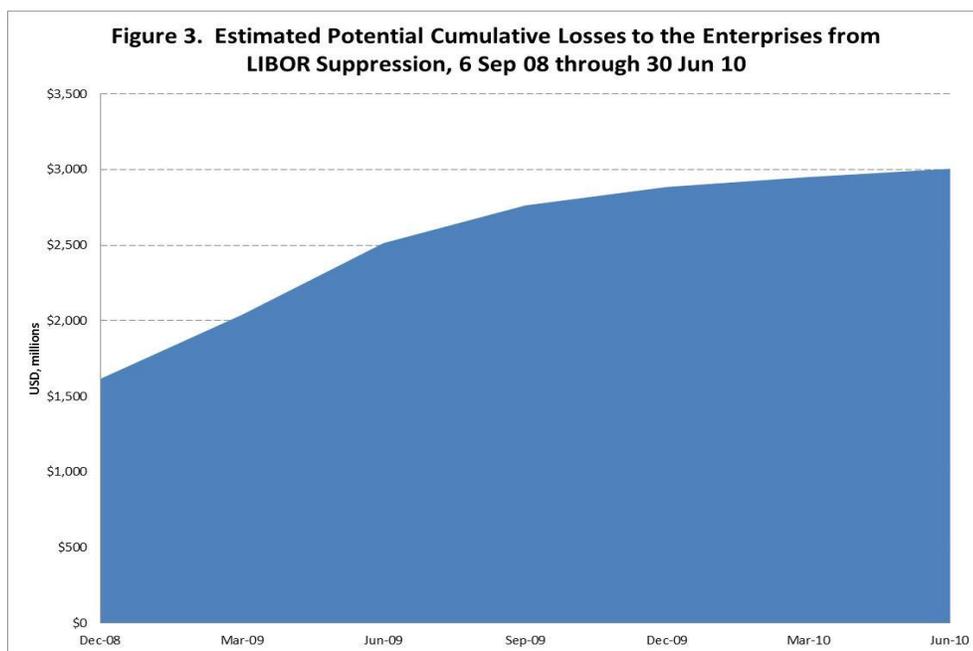
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major

<sup>d</sup> Further details on our methodology are available in the Appendix.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both set LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations, and/or is a named defendant in existing civil actions.<sup>23</sup>

### Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

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- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.
- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## **Appendix**

### **Notes on Analytical Methodology**

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the [U.S. Commodity Futures Trading Commission](#), cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of the LIBOR index.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

#### **Calculation of Enterprise Losses**

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently -used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfaoig.gov](mailto:timothy.lee@fhfaoig.gov).

## Endnotes

<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>4</sup> ~~US~~U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."<sup>2</sup>

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddie.mac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddie.mac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.

<sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.

<sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>18</sup> ~~US~~U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

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<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012, p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See [USU.S.](#) Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to [USU.S.](#) dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## **RE: LIBOR: the latest and greatest**

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**Item ID:** 32160  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, Wu, Simon </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=144fe221a23346a2820093edb75d9ec8-Simon Wu>  
**Subject:** RE: LIBOR: the latest and greatest  
**Sent:** October 25, 2012 1:49 PM  
**Received:** October 25, 2012 1:49 PM

Hi Old Salt, Attached are my edits to the cover memo. You will see that the changes are all stylistic. As far as indexing my work, I have taken care to reference the memorandum thoroughly. The links should click right through to the appropriate sources, so that anything we assert may be quickly and easily verified. That said, the endnote citations may not be MLA (or whatever we use) standard. Should I get help in seeing that they are properly formatted? Tim

From: Parker, Richard Sent: Thursday, October 25, 2012 12:53 PM To: Lee, Timothy Subject: FW: LIBOR: the latest and greatest Skipper, I'm alright with this. I need your buy-in. Also – pls tell me what you did to index your work against the sources set forth in the end notes and links. Tx, Rich From: (b) (6) Sent: Thursday, October 25, 2012 12:01 PM To: Parker, Richard Subject: RE: LIBOR: the latest and greatest Two docs are attached; the final doc is "LIBOR memos and appendix" and it contains both memos and the appendix from the links below. There is one comment bubble on the first page that needs a second look for rephrasing. I did read through everything and made minor proofing corrections, but because the final contains a number of hyperlinks I did not want to Track Change in it as many times the links go wonky. Therefore, the second doc "REDLINE" is a redline (HA, go figure) of all your original files vs the final and you can see all of the proofing edits I made. If you do not agree with something I changed, you will need to restore it in the final. Holler if you have any questions. (b) (6) From: Parker, Richard Sent: Wednesday, October 24, 2012 5:18 PM To: (b) (6) Subject: FW: LIBOR: the latest and greatest (b) (6), Here are the 3 documents about which we spoke. Many thanks for the good help. Rich Richard Parker Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6) From: Lee, Timothy Sent: Wednesday, October 24, 2012 11:41 AM To: Parker, Richard Subject: LIBOR: the latest and greatest Memo with cover note Spreadsheet Appendix ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**REDLINE cover memo.docx**

**Original view**

14 pages (displayed on pages 3 to 16)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October ~~22~~<sup>26</sup>, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to alleged manipulation of the London Interbank Offered Rate (LIBOR) by a number of major financial institutions. As you know, on June 27, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation at other institutions are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's June 27th announcement of its agreement with Barclays. On September ~~6th~~ and ~~11th~~ they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The enclosed memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises.

~~In light of the fact that~~ my staff has tentatively~~preliminarily~~ estimated that the Enterprises may have suffered more than \$3 billion in such losses, ~~which that~~Those losses, of course, would have been funded by the Department of the Treasury under the Senior Preferred Stock Purchase Agreements in place with each Enterprise; I therefore believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of the members of my staff in this regard.

Comment [pam1]: awkward; perhaps rephrase to "preliminary estimates showing"



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (~~“(LIBOR)”~~) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments, and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and ~~“U.S.”~~ authorities, including the Department of Justice (~~“(DOJ)”~~), Barclays Bank Plc (~~“(Barclays)”~~) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for

financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## Background

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, “[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)”, July 18, 2012.

market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

#### **Analysis**

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions, and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, “effectively, these two rates should be the same as they are the same instrument.”<sup>13</sup>

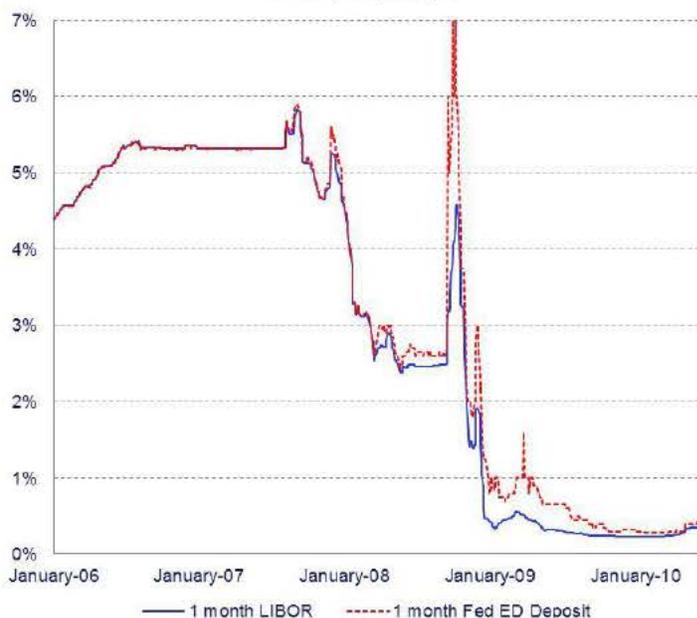
However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S. investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds’ bankruptcy filings at the end of July.<sup>16</sup>

As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions’ LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ’s statement of facts regarding Barclays’ admitted LIBOR manipulation, which reads in part:

... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays’s high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays’s Dollar LIBOR submissions be

Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10

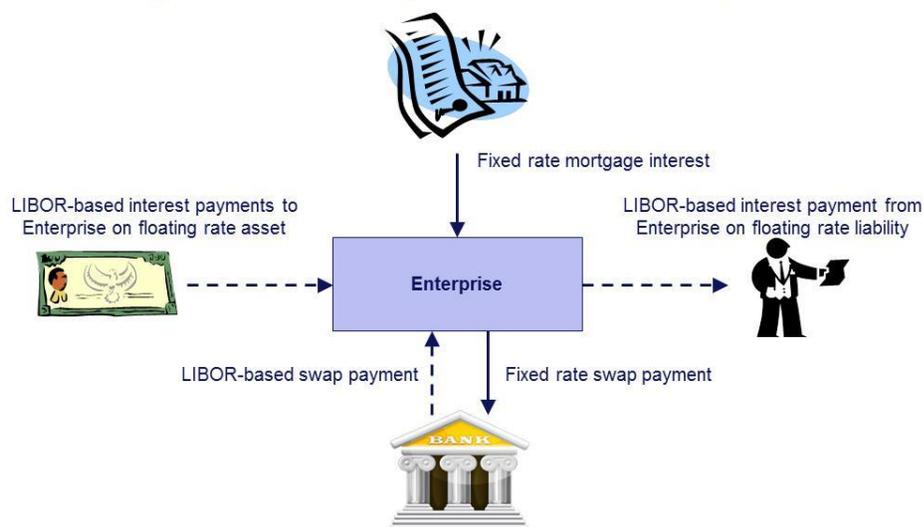


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lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

Figure 2. LIBOR-Based Payments to and From the Enterprises



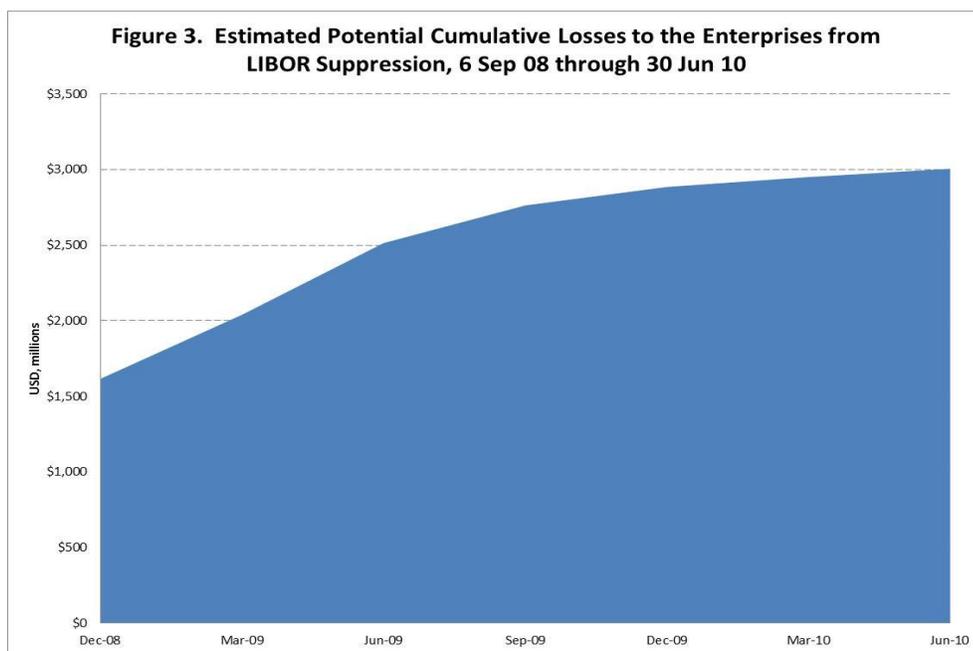
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

- Second, we reviewed the Enterprises' publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>



Using this methodology, we estimate that, from the beginning of the Enterprises' conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises' interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major

<sup>d</sup> Further details on our methodology are available in the Appendix.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both set LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations, and/or is a named defendant in existing civil actions.<sup>23</sup>

### Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

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- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.
- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## **Appendix**

### **Notes on Analytical Methodology**

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the [U.S. Commodity Futures Trading Commission](#), cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of the LIBOR index.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

#### **Calculation of Enterprise Losses**

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently -used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfaoig.gov](mailto:timothy.lee@fhfaoig.gov).

## Endnotes

<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)," July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>4</sup> ~~US~~U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)," September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)," January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#),"<sup>2</sup>

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniema.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.

<sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.

<sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>18</sup> ~~US~~U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

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<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012, p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See [USU.S.](#) Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to [USU.S.](#) dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## **RE: LIBOR: the latest and greatest**

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**Item ID:** 32161  
**From:** Wu, Simon (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaig.gov>, Parker, Richard (b) (6)  
**Cc:** Bloch, David (b) (6)  
**Subject:** RE: LIBOR: the latest and greatest  
**Sent:** October 25, 2012 4:53 PM  
**Received:** October 25, 2012 4:53 PM

Ok. See my comments and edits. Thanks and looks good. Simon Z. Wu, Ph.D. Chief Economist Office of Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, DC 20024 Voice: (b) (6) From: Lee, Timothy Sent: Thursday, October 25, 2012 1:50 PM To: Parker, Richard Cc: Bloch, David; Wu, Simon Subject: RE: LIBOR: the latest and greatest Hi Old Salt, Attached are my edits to the cover memo. You will see that the changes are all stylistic. As far as indexing my work, I have taken care to reference the memorandum thoroughly. The links should click right through to the appropriate sources, so that anything we assert may be quickly and easily verified. That said, the endnote citations may not be MLA (or whatever we use) standard. Should I get help in seeing that they are properly formatted? Tim From: Parker, Richard Sent: Thursday, October 25, 2012 12:53 PM To: Lee, Timothy Subject: FW: LIBOR: the latest and greatest Skipper, I'm alright with this. I need your buy-in. Also – pls tell me what you did to index your work against the sources set forth in the end notes and links. Tx, Rich From: (b) (6) Sent: Thursday, October 25, 2012 12:01 PM To: Parker, Richard Subject: RE: LIBOR: the latest and greatest Two docs are attached; the final doc is "LIBOR memos and appendix" and it contains both memos and the appendix from the links below. There is one comment bubble on the first page that needs a second look for rephrasing. I did read through everything and made minor proofing corrections, but because the final contains a number of hyperlinks I did not want to Track Change in it as many times the links go wonky. Therefore, the second doc "REDLINE" is a redline (HA, go figure) of all your original files vs the final and you can see all of the proofing edits I made. If you do not agree with something I changed, you will need to restore it in the final. Holler if you have any questions. (b) (6) From: Parker, Richard Sent: Wednesday, October 24, 2012 5:18 PM To: (b) (6) Subject: FW: LIBOR: the latest and greatest (b) (6), Here are the 3 documents about which we spoke. Many thanks for the good help. Rich Richard Parker Director, Policy, Oversight & Review Office of the Inspector General Federal Housing Finance Agency 400 7 th Street, SW Washington, D.C. 20024 Tel: (b) (6) Cell: (b) (6) From: Lee, Timothy Sent: Wednesday, October 24, 2012 11:41 AM To: Parker, Richard Subject: LIBOR: the latest and greatest Memo with cover note Spreadsheet Appendix ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**REDLINE cover memo.docx**

**Original view**

14 pages (displayed on pages 3 to 16)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** October ~~22~~26, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to alleged manipulation of the London Interbank Offered Rate (LIBOR) by a number of major financial institutions. As you know, on June 27, 2012, the Department of Justice announced an agreement with Barclays Bank Plc. (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation at other institutions are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's ~~June 27th~~ announcement of its agreement with Barclays. On September ~~6th~~ and ~~11th~~ they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The enclosed memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises.

In light of the fact that my staff has tentatively~~preliminarily~~ estimated that the Enterprises may have suffered more than \$3 billion in such losses, ~~which that~~Those losses, of course, would have been funded by the Department of the Treasury under the Senior Preferred Stock Purchase Agreements in place with each Enterprise; I therefore believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of the members of my staff in this regard.

Comment [pam1]: awkward; perhaps rephrase to "preliminary estimates showing"

Agree. maybe "Preliminary estimates provided by my staff shows..."? Simon Wu



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

(b) (5)

financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, “[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)”, July 18, 2012.

market risk that their investments' value may decline due to adverse interest rate movements. The Enterprises' two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises' mortgage portfolios generally contain more fixed-rate loans than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

#### **Analysis**

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions, and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, “effectively, these two rates should be the same as they are the same instrument.”<sup>13</sup>

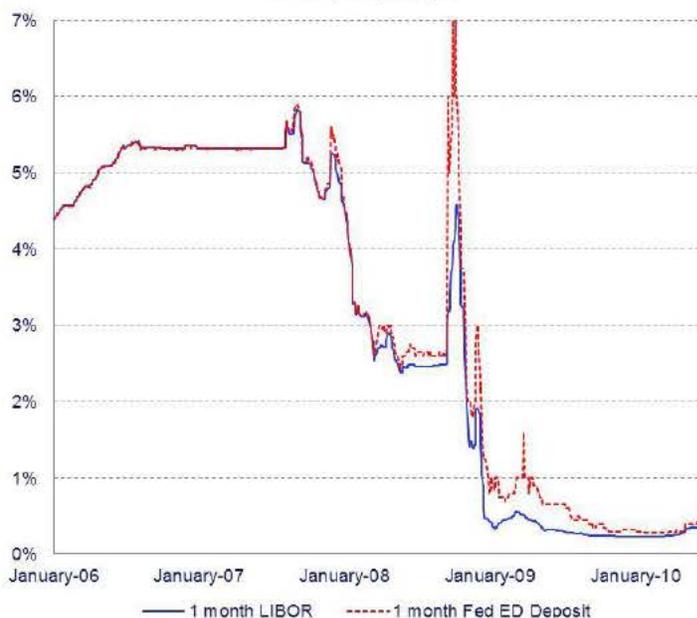
However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S. investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds’ bankruptcy filings at the end of July.<sup>16</sup>

As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions’ LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ’s statement of facts regarding Barclays’ admitted LIBOR manipulation, which reads in part:

... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays’s high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays’s Dollar LIBOR submissions be

Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10

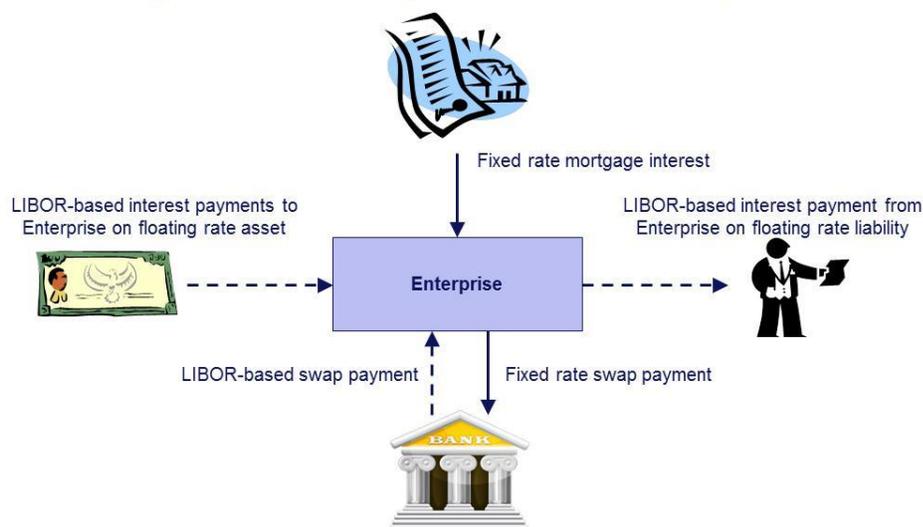


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lowered. This management instruction often resulted in Barclays’s submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises’ own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 2. LIBOR-Based Payments to and From the Enterprises**



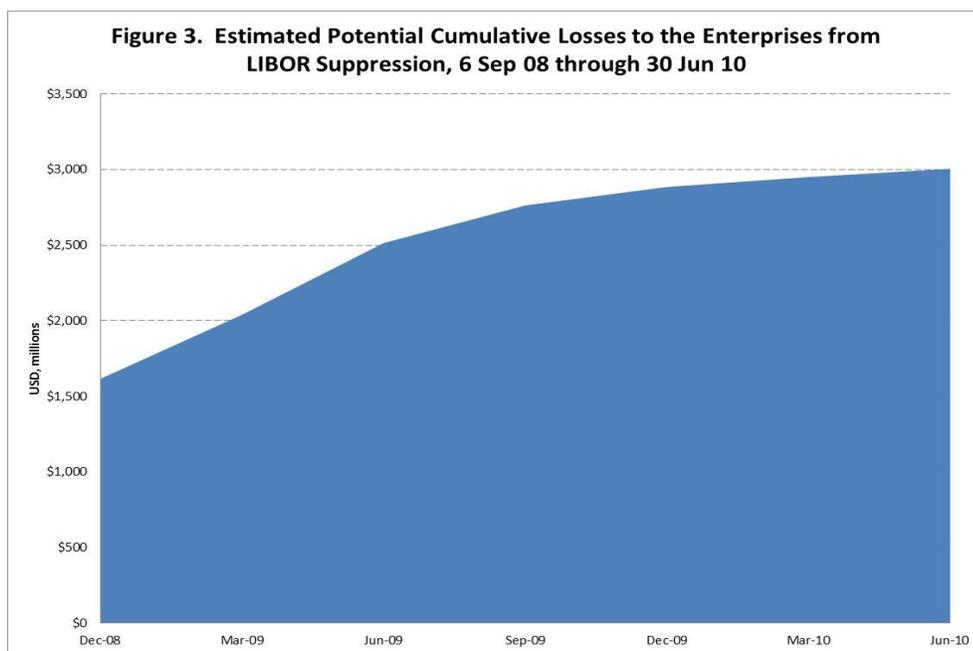
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major

<sup>d</sup> Further details on our methodology are available in the Appendix.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both set LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations, and/or is a named defendant in existing civil actions.<sup>23</sup>

**Recommendations**

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

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- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.
- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## **Appendix**

### **Notes on Analytical Methodology**

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the [U.S. Commodity Futures Trading Commission](#), cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of the LIBOR index.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

#### **Calculation of Enterprise Losses**

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently -used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfaoig.gov](mailto:timothy.lee@fhfaoig.gov).

## Endnotes

<sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."

<sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.

<sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."

<sup>4</sup> ~~US~~U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

<sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.

<sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.

<sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010

<sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."<sup>2</sup>

<sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddie.mac.com/investors/sec\\_filings/?intcmp=AFIRSE](http://www.freddie.mac.com/investors/sec_filings/?intcmp=AFIRSE). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.

<sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.

<sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.

<sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.

<sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.

<sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.

<sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.

<sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.

<sup>18</sup> ~~US~~U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

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<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012, p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See [USU.S.](#) Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to [USU.S.](#) dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## Christy Romero . . .

---

**Item ID:** 32162  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** Christy Romero . . .  
**Sent:** October 26, 2012 11:30 AM  
**Received:** October 26, 2012 11:30 AM

. . . released a LIBOR/TARP report today. See WP at p.A.18. Sent from my Windows Phone

## RE: Christy Romero . . .

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**Item ID:** 32163  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** RE: Christy Romero . . .  
**Sent:** October 26, 2012 12:52 PM  
**Received:** October 26, 2012 12:52 PM

Hi Old Salt, Thanks for the heads up. Generally I try to think about SIGTARP as little as possible. When you are back in the office I can offer my views of Christy. Couldn't find page A.18, but did run a keyword search on LIBOR and found the discussion of their recommendation. I think it speaks for the authority and reasonableness of our analysis that they cite many of the same sources we do, like Gensler and Wheatley (whose quote that "it is already clear that at least some serious misconduct has taken place relating to LIBOR submissions in recent years" may be worth lifting for our own memo). Moreover, there is a passage on page 175 worth quoting: [On July 25] Secretary Geithner testified that he did not know if the taxpayers who funded TARP were disadvantaged by the manipulation of LIBOR, but that Treasury was looking into it. [REDACTED] (b) (5)

[REDACTED]

Tim PS. Should I reach out to NYSAG to check in, given that they filed additional subpoenas a day or so ago? From: Parker, Richard Sent: Friday, October 26, 2012 11:31 AM To: Lee, Timothy Subject: Christy Romero . . . . . released a LIBOR/TARP report today. See WP at p.A.18. Sent from my Windows Phone

## **FW: Christy Romero . . .**

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**Item ID:** 32165  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Belisle, Kristine </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d4528896afdd4b40ab6583adf32d51c6-Kristine Be>  
**Subject:** FW: Christy Romero . . .  
**Sent:** October 26, 2012 12:55 PM  
**Received:** October 26, 2012 12:55 PM

Hi Kris, Happen to have any color on this? Tim From: Parker, Richard Sent: Friday, October 26, 2012 11:31 AM To: Lee, Timothy Subject: Christy Romero . . . . . released a LIBOR/TARP report today. See WP at p.A.18. Sent from my Windows Phone

## **RE: Christy Romero . . .**

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**Item ID:** 32167  
**From:** Belisle, Kristine [REDACTED] (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Christy Romero . . .  
**Sent:** October 26, 2012 2:17 PM  
**Received:** October 26, 2012 2:17 PM

No clue. First I'm hearing of it! From: Lee, Timothy Sent: Friday, October 26, 2012 12:55 PM To: Belisle, Kristine  
Subject: FW: Christy Romero . . . Hi Kris, Happen to have any color on this? Tim From: Parker, Richard Sent: Friday,  
October 26, 2012 11:31 AM To: Lee, Timothy Subject: Christy Romero . . . . . released a LIBOR/TARP report today.  
See WP at p.A.18. Sent from my Windows Phone

## Sister agencies

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**Item ID:** 32168  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>, (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=61e82b6eb7a942799b83386155b2ad80-(b) (6)>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** Sister agencies  
**Sent:** October 26, 2012 2:46 PM  
**Received:** October 26, 2012 2:46 PM

Hi guys, Old Salt wanted to make clear that, while we can discuss generalities with other agencies, the LIBOR memo itself stays within FHFA-OIG until further notice. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **RE: Sister agencies**

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**Item ID:** 32169  
**From:** (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Bloch, David (b) (6)  
**Cc:** Parker, Richard (b) (6)  
**Subject:** RE: Sister agencies  
**Sent:** October 26, 2012 2:48 PM  
**Received:** October 26, 2012 2:48 PM

OK. This will delay any meeting with FRB-OIG as they want to see the memo before we meet. Let me know when it is cleared for takeoff. From: Lee, Timothy Sent: Friday, October 26, 2012 2:47 PM To: Bloch, David; (b) (6)  
Cc: Parker, Richard Subject: Sister agencies Hi guys, Old Salt wanted to make clear that, while we can discuss generalities with other agencies, the LIBOR memo itself stays within FHFA-OIG until further notice. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## LIBOR Excel sheet

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**Item ID:** 32170  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Cc:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** LIBOR Excel sheet  
**Sent:** October 29, 2012 4:45 PM  
**Received:** October 29, 2012 4:45 PM

Hi Old Salt, With a little spare time on my hands today, I went back and triple-checked all the numbers in the LIBOR analysis. I have also hyperlinked all the numbers I used to specific tables in the financial statements, so that anyone who wants to can click through and see immediately where I got my numbers. This obviates anybody else's need to recheck the Excel sheet. At this point, I am perfectly content to distribute this file along with the memo when authorized. In fact, for the sake of transparency, I recommend we do exactly that. This file is also on SharePoint. Tim --  
--- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR proposal Verified Oct 29.xlsx**

**Original view**

209 pages (displayed on pages 3 to 211)

## Cash Flow Shortfall from LIBOR Suppression

Enterprises Variable Rate Mortgage Assets and Interest Rate Swaps

dollars in millions

	30-Jun-07	30-Sep-07	31-Dec-07	31-Mar-08	30-Jun-08	30-Sep-08	31-Dec-08
<b>Swap Notional Amounts</b>							
<b>Fannie Mae</b>	<a href="#">Table 25</a>	<a href="#">Table 28</a>	<a href="#">Table 30</a>	<a href="#">Table 43</a>	<a href="#">Table 43</a>	<a href="#">Table 48</a>	<a href="#">Table 29</a>
Pay Fixed S	303,243	329,657	377,738	443,845	526,028	515,853	546,916
Less: Recei	248,916	256,902	285,885	408,658	409,181	372,555	451,081
Plus: Basis	7,601	8,401	7,001	18,026	25,626	24,761	24,560
Net Receiv	61,928	81,156	98,854	53,213	142,473	168,059	120,395
<b>Freddie Ma</b>	<a href="#">Table 7</a>	<a href="#">Table 7</a>	<a href="#">Table 15</a>	<a href="#">Table 17</a>	<a href="#">Table 26</a>	<a href="#">Table 28</a>	<a href="#">Table 38</a>
Less: Rece	214,657	282,070	301,649	326,247	245,054	329,828	279,609
Plus: Pay F	284,927	380,370	409,682	425,450	411,074	452,633	404,359
Plus: Basis	473	1,093	498	17,988	32,205	82,205	82,190
Net Receiv	70,743	99,393	108,531	117,191	198,225	205,010	206,940
<b>Enterprises</b>							
Net Receiv	132,671	180,549	207,385	170,404	340,698	373,069	327,335
<b>Mortgage Related Securities on Balance Sheet</b>							
<b>Fannie Mae</b>	<a href="#">Table 11</a>	<a href="#">Table 11</a>	<a href="#">Table 23</a>	<a href="#">Table 22</a>	<a href="#">Table 22</a>	<a href="#">Table 22</a>	<a href="#">Table 20</a>
Capital Ma	333,959	329,158	324,326	314,867	333,124	359,495	362,703
Freddie Ma	43%	42%	42%	43%	39%	41%	37%
Estimated I	143,728	139,816	136,268	134,230	130,345	146,025	132,796
<b>Freddie Ma</b>	<a href="#">Table 10</a>	<a href="#">Table 10</a>	<a href="#">Table 22</a>	<a href="#">Table 15</a>	<a href="#">Table 15</a>	<a href="#">Table 17</a>	<a href="#">Table 24</a>
Fixed Rate	405,650	410,235	417,959	408,735	481,983	437,560	510,116
Variable Ra	306,486	302,929	302,854	303,727	309,815	299,316	294,646
Variable Ra	43%	42%	42%	43%	39%	41%	37%
<b>Floating Rate Liabilities on Balance Sheet</b>							
<b>Fannie Mae</b>	<a href="#">Table 13</a>	<a href="#">Table 13</a>	<a href="#">Table 28</a>	<a href="#">Note 8</a>	<a href="#">Note 8</a>	<a href="#">Note 9</a>	<a href="#">Note 10</a>
Floating Rate Short Term Debt			-	4,501	4,501	4,495	7,585
Senior Floa	12,201	15,651	13,700	25,652	33,064	47,087	46,611
<b>Freddie Ma</b>	<a href="#">Table 7.1</a>	<a href="#">Table 7.1</a>	<a href="#">Table 7.3</a>	<a href="#">Table 7.1</a>	<a href="#">Table 7.1</a>	<a href="#">Table 7.1</a>	<a href="#">Table 8.3</a>
Long-Term	24,176	25,487	25,566	25,230	27,093	24,708	13,664
Total Other	483,522	509,744	479,087	504,592	541,851	494,168	433,954
Ratio: Vari	5%	5%	5%	5%	5%	5%	3%

**Enterprises**

Estimated \	413,837	401,606	399,856	382,574	375,502	369,051	359,582
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Fed ED-LIBI	#NAME?						
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**Estimated Damages**

LIBOR Cash	#NAME?						
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LIBOR Cash	#NAME?						
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Prorated LIBOR Cash Flow Shortfall - 9/6/08 thru 9/30/08						#NAME?	
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31-Mar-09 30-Jun-09 30-Sep-09 31-Dec-09 31-Mar-10 30-Jun-10

<a href="#">Table 50</a>	<a href="#">Table 45</a>	<a href="#">Table 47</a>	<a href="#">Table 53</a>	<a href="#">Table 45</a>	<a href="#">Table 48</a>
620,850	650,447	435,693	382,600	315,857	317,259
549,823	571,802	340,384	275,417	229,293	234,901
19,815	22,200	11,000	3,225	3,220	3,020
90,842	100,845	106,309	110,408	89,784	85,378

<a href="#">Table 25</a>	<a href="#">Table 26</a>	<a href="#">Table 26</a>	<a href="#">Table 38</a>	<a href="#">Table 29</a>	<a href="#">Table 29</a>
336,207	284,244	320,458	271,403	255,940	349,545
342,747	401,901	414,776	382,259	382,145	386,194
82,090	51,065	51,615	52,045	54,070	53,910
88,630	168,722	145,933	162,901	180,275	90,559

179,472 269,567 252,242 273,309 270,059 175,937

<a href="#">Table 20</a>	<a href="#">Table 18</a>	<a href="#">Table 19</a>	<a href="#">Table 22</a>	<a href="#">Table 18</a>	<a href="#">Table 22</a>
353,172	369,546	368,389	352,709	434,532	391,615
33%	34%	34%	40%	52%	52%
116,457	124,378	125,616	139,775	224,780	204,120

<a href="#">Table 19</a>	<a href="#">Table 19</a>	<a href="#">Table 19</a>	<a href="#">Table 28</a>	<a href="#">Table 19</a>	<a href="#">Table 20</a>
581,180	550,539	516,778	372,160	159,278	148,851
285,924	279,298	267,393	244,296	170,690	162,049
33%	34%	34%	40%	52%	52%

<a href="#">Note 10</a>	<a href="#">Note 10</a>	<a href="#">Note 10</a>	<a href="#">Note 9</a>	<a href="#">Note 9</a>	<a href="#">Note 9</a>
3,132	3,102	3,069	50	-	-
58,770	68,766	51,142	42,952	46,170	45,144

<a href="#">Table 7.1</a>	<a href="#">Table 7.1</a>	<a href="#">Table 7.1</a>	<a href="#">Table 9.3</a>	<a href="#">Table 8.3</a>	<a href="#">Table 8.3</a>
118,160	126,647	113,775	65,855	126,036	144,833
478,379	512,742	460,626	461,051	593,174	585,630
25%	25%	25%	14%	21%	25%

222,319 205,161 225,024 275,214 223,264 176,192

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Federal  
Reserve  
ED  
Deposits  
Less  
LIBOR, 1  
month  
tenor

**4-Jan-00 through 14-Jun-07**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**15-jun-07 through 7-Sep-08**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

**6-sep-08 through 27-jun-12**

Average Spread #NAME?  
Incidence of Zero or Negative Spre #DIV/0!  
Highest Spread #NAME?

Date	1 month			Date	3 month	
	1 month LIBOR	Fed ED Deposit	1 month Spread		3 month LIBOR	Fed ED Deposit
4-Jan-00	#NAME?	#NAME?	#NAME?	4-Jan-00	#NAME?	#NAME?
5-Jan-00	#NAME?	#NAME?	#NAME?	5-Jan-00	#NAME?	#NAME?
6-Jan-00	#NAME?	#NAME?	#NAME?	6-Jan-00	#NAME?	#NAME?
7-Jan-00	#NAME?	#NAME?	#NAME?	7-Jan-00	#NAME?	#NAME?
10-Jan-00	#NAME?	#NAME?	#NAME?	10-Jan-00	#NAME?	#NAME?
11-Jan-00	#NAME?	#NAME?	#NAME?	11-Jan-00	#NAME?	#NAME?
12-Jan-00	#NAME?	#NAME?	#NAME?	12-Jan-00	#NAME?	#NAME?
13-Jan-00	#NAME?	#NAME?	#NAME?	13-Jan-00	#NAME?	#NAME?
14-Jan-00	#NAME?	#NAME?	#NAME?	14-Jan-00	#NAME?	#NAME?
18-Jan-00	#NAME?	#NAME?	#NAME?	18-Jan-00	#NAME?	#NAME?
19-Jan-00	#NAME?	#NAME?	#NAME?	19-Jan-00	#NAME?	#NAME?
20-Jan-00	#NAME?	#NAME?	#NAME?	20-Jan-00	#NAME?	#NAME?
21-Jan-00	#NAME?	#NAME?	#NAME?	21-Jan-00	#NAME?	#NAME?
24-Jan-00	#NAME?	#NAME?	#NAME?	24-Jan-00	#NAME?	#NAME?
25-Jan-00	#NAME?	#NAME?	#NAME?	25-Jan-00	#NAME?	#NAME?
26-Jan-00	#NAME?	#NAME?	#NAME?	26-Jan-00	#NAME?	#NAME?
27-Jan-00	#NAME?	#NAME?	#NAME?	27-Jan-00	#NAME?	#NAME?
28-Jan-00	#NAME?	#NAME?	#NAME?	28-Jan-00	#NAME?	#NAME?





16-Jun-00	#NAME?	#NAME?	#NAME?	16-Jun-00	#NAME?	#NAME?
19-Jun-00	#NAME?	#NAME?	#NAME?	19-Jun-00	#NAME?	#NAME?
20-Jun-00	#NAME?	#NAME?	#NAME?	20-Jun-00	#NAME?	#NAME?
21-Jun-00	#NAME?	#NAME?	#NAME?	21-Jun-00	#NAME?	#NAME?
22-Jun-00	#NAME?	#NAME?	#NAME?	22-Jun-00	#NAME?	#NAME?
23-Jun-00	#NAME?	#NAME?	#NAME?	23-Jun-00	#NAME?	#NAME?
26-Jun-00	#NAME?	#NAME?	#NAME?	26-Jun-00	#NAME?	#NAME?
27-Jun-00	#NAME?	#NAME?	#NAME?	27-Jun-00	#NAME?	#NAME?
28-Jun-00	#NAME?	#NAME?	#NAME?	28-Jun-00	#NAME?	#NAME?
29-Jun-00	#NAME?	#NAME?	#NAME?	29-Jun-00	#NAME?	#NAME?
30-Jun-00	#NAME?	#NAME?	#NAME?	30-Jun-00	#NAME?	#NAME?
3-Jul-00	#NAME?	#NAME?	#NAME?	3-Jul-00	#NAME?	#NAME?
5-Jul-00	#NAME?	#NAME?	#NAME?	5-Jul-00	#NAME?	#NAME?
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25-Jul-00	#NAME?	#NAME?	#NAME?	25-Jul-00	#NAME?	#NAME?
26-Jul-00	#NAME?	#NAME?	#NAME?	26-Jul-00	#NAME?	#NAME?
27-Jul-00	#NAME?	#NAME?	#NAME?	27-Jul-00	#NAME?	#NAME?
28-Jul-00	#NAME?	#NAME?	#NAME?	28-Jul-00	#NAME?	#NAME?
31-Jul-00	#NAME?	#NAME?	#NAME?	31-Jul-00	#NAME?	#NAME?
1-Aug-00	#NAME?	#NAME?	#NAME?	1-Aug-00	#NAME?	#NAME?
2-Aug-00	#NAME?	#NAME?	#NAME?	2-Aug-00	#NAME?	#NAME?
3-Aug-00	#NAME?	#NAME?	#NAME?	3-Aug-00	#NAME?	#NAME?
4-Aug-00	#NAME?	#NAME?	#NAME?	4-Aug-00	#NAME?	#NAME?
7-Aug-00	#NAME?	#NAME?	#NAME?	7-Aug-00	#NAME?	#NAME?
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14-Aug-00	#NAME?	#NAME?	#NAME?	14-Aug-00	#NAME?	#NAME?
15-Aug-00	#NAME?	#NAME?	#NAME?	15-Aug-00	#NAME?	#NAME?
16-Aug-00	#NAME?	#NAME?	#NAME?	16-Aug-00	#NAME?	#NAME?
17-Aug-00	#NAME?	#NAME?	#NAME?	17-Aug-00	#NAME?	#NAME?
18-Aug-00	#NAME?	#NAME?	#NAME?	18-Aug-00	#NAME?	#NAME?
21-Aug-00	#NAME?	#NAME?	#NAME?	21-Aug-00	#NAME?	#NAME?
22-Aug-00	#NAME?	#NAME?	#NAME?	22-Aug-00	#NAME?	#NAME?



1-Nov-00	#NAME?	#NAME?	#NAME?	1-Nov-00	#NAME?	#NAME?
2-Nov-00	#NAME?	#NAME?	#NAME?	2-Nov-00	#NAME?	#NAME?
3-Nov-00	#NAME?	#NAME?	#NAME?	3-Nov-00	#NAME?	#NAME?
6-Nov-00	#NAME?	#NAME?	#NAME?	6-Nov-00	#NAME?	#NAME?
7-Nov-00	#NAME?	#NAME?	#NAME?	7-Nov-00	#NAME?	#NAME?
8-Nov-00	#NAME?	#NAME?	#NAME?	8-Nov-00	#NAME?	#NAME?
9-Nov-00	#NAME?	#NAME?	#NAME?	9-Nov-00	#NAME?	#NAME?
10-Nov-00	#NAME?	#NAME?	#NAME?	10-Nov-00	#NAME?	#NAME?
13-Nov-00	#NAME?	#NAME?	#NAME?	13-Nov-00	#NAME?	#NAME?
14-Nov-00	#NAME?	#NAME?	#NAME?	14-Nov-00	#NAME?	#NAME?
15-Nov-00	#NAME?	#NAME?	#NAME?	15-Nov-00	#NAME?	#NAME?
16-Nov-00	#NAME?	#NAME?	#NAME?	16-Nov-00	#NAME?	#NAME?
17-Nov-00	#NAME?	#NAME?	#NAME?	17-Nov-00	#NAME?	#NAME?
20-Nov-00	#NAME?	#NAME?	#NAME?	20-Nov-00	#NAME?	#NAME?
21-Nov-00	#NAME?	#NAME?	#NAME?	21-Nov-00	#NAME?	#NAME?
22-Nov-00	#NAME?	#NAME?	#NAME?	22-Nov-00	#NAME?	#NAME?
24-Nov-00	#NAME?	#NAME?	#NAME?	24-Nov-00	#NAME?	#NAME?
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28-Nov-00	#NAME?	#NAME?	#NAME?	28-Nov-00	#NAME?	#NAME?
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30-Nov-00	#NAME?	#NAME?	#NAME?	30-Nov-00	#NAME?	#NAME?
1-Dec-00	#NAME?	#NAME?	#NAME?	1-Dec-00	#NAME?	#NAME?
4-Dec-00	#NAME?	#NAME?	#NAME?	4-Dec-00	#NAME?	#NAME?
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13-Dec-00	#NAME?	#NAME?	#NAME?	13-Dec-00	#NAME?	#NAME?
14-Dec-00	#NAME?	#NAME?	#NAME?	14-Dec-00	#NAME?	#NAME?
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22-Dec-00	#NAME?	#NAME?	#NAME?	22-Dec-00	#NAME?	#NAME?
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28-Dec-00	#NAME?	#NAME?	#NAME?	28-Dec-00	#NAME?	#NAME?
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15-Feb-12	#NAME?	#NAME?	#NAME?	15-Feb-12	#NAME?	#NAME?
16-Feb-12	#NAME?	#NAME?	#NAME?	16-Feb-12	#NAME?	#NAME?
17-Feb-12	#NAME?	#NAME?	#NAME?	17-Feb-12	#NAME?	#NAME?
20-Feb-12	#NAME?	#NAME?	#NAME?	20-Feb-12	#NAME?	#NAME?
21-Feb-12	#NAME?	#NAME?	#NAME?	21-Feb-12	#NAME?	#NAME?
22-Feb-12	#NAME?	#NAME?	#NAME?	22-Feb-12	#NAME?	#NAME?
23-Feb-12	#NAME?	#NAME?	#NAME?	23-Feb-12	#NAME?	#NAME?
24-Feb-12	#NAME?	#NAME?	#NAME?	24-Feb-12	#NAME?	#NAME?
27-Feb-12	#NAME?	#NAME?	#NAME?	27-Feb-12	#NAME?	#NAME?
28-Feb-12	#NAME?	#NAME?	#NAME?	28-Feb-12	#NAME?	#NAME?
29-Feb-12	#NAME?	#NAME?	#NAME?	29-Feb-12	#NAME?	#NAME?
1-Mar-12	#NAME?	#NAME?	#NAME?	1-Mar-12	#NAME?	#NAME?
2-Mar-12	#NAME?	#NAME?	#NAME?	2-Mar-12	#NAME?	#NAME?
5-Mar-12	#NAME?	#NAME?	#NAME?	5-Mar-12	#NAME?	#NAME?

6-Mar-12	#NAME?	#NAME?	#NAME?	6-Mar-12	#NAME?	#NAME?
7-Mar-12	#NAME?	#NAME?	#NAME?	7-Mar-12	#NAME?	#NAME?
8-Mar-12	#NAME?	#NAME?	#NAME?	8-Mar-12	#NAME?	#NAME?
9-Mar-12	#NAME?	#NAME?	#NAME?	9-Mar-12	#NAME?	#NAME?
12-Mar-12	#NAME?	#NAME?	#NAME?	12-Mar-12	#NAME?	#NAME?
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14-Mar-12	#NAME?	#NAME?	#NAME?	14-Mar-12	#NAME?	#NAME?
15-Mar-12	#NAME?	#NAME?	#NAME?	15-Mar-12	#NAME?	#NAME?
16-Mar-12	#NAME?	#NAME?	#NAME?	16-Mar-12	#NAME?	#NAME?
19-Mar-12	#NAME?	#NAME?	#NAME?	19-Mar-12	#NAME?	#NAME?
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29-Mar-12	#NAME?	#NAME?	#NAME?	29-Mar-12	#NAME?	#NAME?
30-Mar-12	#NAME?	#NAME?	#NAME?	30-Mar-12	#NAME?	#NAME?
2-Apr-12	#NAME?	#NAME?	#NAME?	2-Apr-12	#NAME?	#NAME?
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5-Apr-12	#NAME?	#NAME?	#NAME?	5-Apr-12	#NAME?	#NAME?
10-Apr-12	#NAME?	#NAME?	#NAME?	10-Apr-12	#NAME?	#NAME?
11-Apr-12	#NAME?	#NAME?	#NAME?	11-Apr-12	#NAME?	#NAME?
12-Apr-12	#NAME?	#NAME?	#NAME?	12-Apr-12	#NAME?	#NAME?
13-Apr-12	#NAME?	#NAME?	#NAME?	13-Apr-12	#NAME?	#NAME?
16-Apr-12	#NAME?	#NAME?	#NAME?	16-Apr-12	#NAME?	#NAME?
17-Apr-12	#NAME?	#NAME?	#NAME?	17-Apr-12	#NAME?	#NAME?
18-Apr-12	#NAME?	#NAME?	#NAME?	18-Apr-12	#NAME?	#NAME?
19-Apr-12	#NAME?	#NAME?	#NAME?	19-Apr-12	#NAME?	#NAME?
20-Apr-12	#NAME?	#NAME?	#NAME?	20-Apr-12	#NAME?	#NAME?
23-Apr-12	#NAME?	#NAME?	#NAME?	23-Apr-12	#NAME?	#NAME?
24-Apr-12	#NAME?	#NAME?	#NAME?	24-Apr-12	#NAME?	#NAME?
25-Apr-12	#NAME?	#NAME?	#NAME?	25-Apr-12	#NAME?	#NAME?
26-Apr-12	#NAME?	#NAME?	#NAME?	26-Apr-12	#NAME?	#NAME?
27-Apr-12	#NAME?	#NAME?	#NAME?	27-Apr-12	#NAME?	#NAME?
30-Apr-12	#NAME?	#NAME?	#NAME?	30-Apr-12	#NAME?	#NAME?
1-May-12	#NAME?	#NAME?	#NAME?	1-May-12	#NAME?	#NAME?
2-May-12	#NAME?	#NAME?	#NAME?	2-May-12	#NAME?	#NAME?
3-May-12	#NAME?	#NAME?	#NAME?	3-May-12	#NAME?	#NAME?
4-May-12	#NAME?	#NAME?	#NAME?	4-May-12	#NAME?	#NAME?
8-May-12	#NAME?	#NAME?	#NAME?	8-May-12	#NAME?	#NAME?
9-May-12	#NAME?	#NAME?	#NAME?	9-May-12	#NAME?	#NAME?
#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?
#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?
#####	#NAME?	#NAME?	#NAME?	#####	#NAME?	#NAME?





















































































#NAME?

















































USD3MTD156N		USD1MTD156N		DED1		DED3	
lin	Percent	lin	Percent	lin	Percent	lin	Percent
D	Daily	D	Daily	D	Daily	D	Daily
1/1/2000	1986-01-02	1/1/2000	1986-01-02	1/1/2000	1971-01-04	1/1/2000	1971-01-04 to 2012-09
<a href="#">3-Month London Inter</a>		<a href="#">1-Month London Inter</a>		<a href="#">1-Month Eurodollar De</a>		<a href="#">3-Month Eurodollar Deposit Rate</a>	
British Bankers' Associ		British Bankers' Associ		Board of Governors of		Board of Governors of the Federal	
date	value	date	value	date	value	date	value
1/4/2000	6.0	1/4/2000	5.8	1/3/2000	5.7	1/3/2000	5.9
1/5/2000	6.0	1/5/2000	5.8	1/4/2000	5.7	1/4/2000	5.9
1/6/2000	6.0	1/6/2000	5.8	1/5/2000	5.7	1/5/2000	5.9
1/7/2000	6.0	1/7/2000	5.8	1/6/2000	5.7	1/6/2000	5.9
#####	6.0	#####	5.8	1/7/2000	5.7	1/7/2000	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	#N/A	#####	#N/A
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.7	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.8	#####	5.8	#####	5.9
#####	6.0	#####	5.9	#####	5.7	#####	5.9
#####	6.1	#####	5.9	#####	5.8	#####	6.0
2/1/2000	6.1	2/1/2000	5.9	#####	5.8	#####	6.0
2/2/2000	6.1	2/2/2000	5.9	2/1/2000	5.8	2/1/2000	6.0
2/3/2000	6.1	2/3/2000	5.9	2/2/2000	5.9	2/2/2000	6.1
2/4/2000	6.1	2/4/2000	5.9	2/3/2000	5.8	2/3/2000	6.0
2/7/2000	6.1	2/7/2000	5.9	2/4/2000	5.8	2/4/2000	6.0
2/8/2000	6.1	2/8/2000	5.9	2/7/2000	5.8	2/7/2000	6.0
2/9/2000	6.1	2/9/2000	5.9	2/8/2000	5.8	2/8/2000	6.0
#####	6.1	#####	5.9	2/9/2000	5.8	2/9/2000	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	#N/A	#####	#N/A
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0
#####	6.1	#####	5.9	#####	5.8	#####	6.0









#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.6	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	6.5	#####	6.6
#####	6.7	#####	6.8	#####	#N/A	#####	#N/A
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#####	6.7	#####	6.8	#####	6.5	#####	6.7
#####	6.6	#####	6.7	#####	6.5	#####	6.7
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.6	#####	6.7	#####	6.7	#####	6.6
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.7	#####	6.6	#####	6.5
#####	6.5	#####	6.6	#####	6.6	#####	6.5
#####	6.5	#####	6.6	#####	6.6	#####	6.5
#####	6.5	#####	6.6	#####	6.6	#####	6.5
#####	6.4	#####	6.6	#####	6.6	#####	6.5
#####	6.4	#####	6.6	#####	6.6	#####	6.4
#####	6.4	#####	6.6	#####	6.5	#####	6.4
1/2/2001	6.4	1/2/2001	6.5	#####	6.5	#####	6.4
1/3/2001	6.3	1/3/2001	6.5	#####	6.6	#####	6.4
1/4/2001	5.9	1/4/2001	6.1	#####	6.6	#####	6.3
1/5/2001	5.7	1/5/2001	5.9	#####	6.6	#####	6.3
1/8/2001	5.6	1/8/2001	5.9	#####	6.6	#####	6.3
1/9/2001	5.6	1/9/2001	5.9	#####	6.5	#####	6.3
#####	5.7	#####	5.9	#####	6.5	#####	6.3
#####	5.7	#####	5.9	#####	6.5	#####	6.3
#####	5.7	#####	5.9	1/1/2001	#N/A	1/1/2001	#N/A
#####	5.7	#####	5.9	1/2/2001	6.5	1/2/2001	6.3
#####	5.7	#####	5.9	1/3/2001	6.4	1/3/2001	6.2
#####	5.7	#####	5.9	1/4/2001	6.0	1/4/2001	5.8
#####	5.6	#####	5.8	1/5/2001	5.9	1/5/2001	5.6
#####	5.6	#####	5.8	1/8/2001	5.8	1/8/2001	5.5
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#####	5.6	#####	5.7	#####	5.8	#####	5.6
#####	5.6	#####	5.7	#####	5.8	#####	5.6
#####	5.6	#####	5.7	#####	5.8	#####	5.6
#####	5.6	#####	5.7	#####	5.8	#####	5.6
#####	5.6	#####	5.7	#####	5.8	#####	5.6
#####	5.6	#####	5.7	#####	#N/A	#####	#N/A
#####	5.5	#####	5.6	#####	5.8	#####	5.7
#####	5.5	#####	5.6	#####	5.8	#####	5.7
#####	5.4	#####	5.6	#####	5.8	#####	5.6
2/1/2001	5.4	2/1/2001	5.6	#####	5.8	#####	5.6

2/2/2001	5.4	2/2/2001	5.6	#####	5.7	#####	5.5
2/5/2001	5.4	2/5/2001	5.6	#####	5.6	#####	5.5
2/6/2001	5.4	2/6/2001	5.6	#####	5.7	#####	5.5
2/7/2001	5.4	2/7/2001	5.6	#####	5.7	#####	5.5
2/8/2001	5.4	2/8/2001	5.6	#####	5.7	#####	5.5
2/9/2001	5.4	2/9/2001	5.6	#####	5.5	#####	5.4
#####	5.4	#####	5.6	#####	5.5	#####	5.4
#####	5.4	#####	5.6	#####	5.5	#####	5.3
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#####	5.4	#####	5.6	2/6/2001	5.5	2/6/2001	5.3
#####	5.4	#####	5.6	2/7/2001	5.5	2/7/2001	5.3
#####	5.4	#####	5.6	2/8/2001	5.5	2/8/2001	5.3
#####	5.3	#####	5.5	2/9/2001	5.5	2/9/2001	5.3
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#####	5.2	#####	5.4	#####	5.5	#####	5.3
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#####	5.1	#####	5.2	#####	5.5	#####	5.3
3/1/2001	5.1	3/1/2001	5.3	#####	5.5	#####	5.3
3/2/2001	5.1	3/2/2001	5.3	#####	#N/A	#####	#N/A
3/5/2001	5.1	3/5/2001	5.3	#####	5.5	#####	5.3
3/6/2001	5.1	3/6/2001	5.3	#####	5.5	#####	5.3
3/7/2001	5.1	3/7/2001	5.3	#####	5.5	#####	5.3
3/8/2001	5.1	3/8/2001	5.2	#####	5.4	#####	5.2
3/9/2001	5.0	3/9/2001	5.2	#####	5.3	#####	5.1
#####	5.1	#####	5.2	#####	5.2	#####	5.0
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#####	5.0	#####	5.2	3/1/2001	5.3	3/1/2001	5.0
#####	4.9	#####	5.1	3/2/2001	5.3	3/2/2001	5.0
#####	4.9	#####	5.0	3/5/2001	5.2	3/5/2001	5.0
#####	4.9	#####	5.0	3/6/2001	5.2	3/6/2001	5.0
#####	4.9	#####	5.0	3/7/2001	5.2	3/7/2001	5.0
#####	4.9	#####	5.1	3/8/2001	5.2	3/8/2001	5.0
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4/2/2001	4.8	4/2/2001	5.1	#####	4.9	#####	4.8
4/3/2001	4.8	4/3/2001	5.1	#####	5.0	#####	4.8
4/4/2001	4.8	4/4/2001	5.1	#####	5.0	#####	4.7
4/5/2001	4.8	4/5/2001	5.1	#####	5.0	#####	4.8
4/6/2001	4.8	4/6/2001	5.1	#####	5.0	#####	4.8
4/9/2001	4.7	4/9/2001	5.0	#####	5.0	#####	4.8

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#####	4.8 #####	5.0 #####	5.0 #####	4.8
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5/2/2001	4.3 5/2/2001	4.4 #####	5.0 #####	4.7
5/3/2001	4.3 5/3/2001	4.4 #####	5.0 #####	4.8
5/4/2001	4.3 5/4/2001	4.4 #####	4.4 #####	4.3
5/8/2001	4.1 5/8/2001	4.2 #####	4.5 #####	4.3
5/9/2001	4.1 5/9/2001	4.2 #####	4.5 #####	4.3
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#####	4.1 #####	4.2 #####	4.4 #####	4.3
#####	4.1 #####	4.1 #####	4.4 #####	4.3
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#####	4.0 #####	4.1 5/1/2001	4.4 5/1/2001	4.3
#####	4.1 #####	4.1 5/2/2001	4.3 5/2/2001	4.2
#####	4.1 #####	4.1 5/3/2001	4.3 5/3/2001	4.2
#####	4.1 #####	4.1 5/4/2001	4.1 5/4/2001	4.0
#####	4.1 #####	4.1 5/7/2001	4.1 5/7/2001	4.0
#####	4.1 #####	4.1 5/8/2001	4.1 5/8/2001	4.0
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#####	4.0 #####	4.1 #####	4.1 #####	4.1
6/1/2001	3.9 6/1/2001	4.0 #####	4.0 #####	4.0
6/4/2001	3.9 6/4/2001	4.0 #####	4.0 #####	3.9
6/5/2001	3.9 6/5/2001	4.0 #####	4.0 #####	3.9
6/6/2001	3.9 6/6/2001	4.0 #####	4.0 #####	4.0
6/7/2001	3.9 6/7/2001	4.0 #####	4.0 #####	4.0
6/8/2001	3.9 6/8/2001	4.0 #####	4.0 #####	4.0
#####	3.9 #####	4.0 #####	4.0 #####	4.0
#####	3.9 #####	4.0 #####	4.0 #####	4.0
#####	3.9 #####	4.0 #####	4.0 #####	3.9
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#####	3.8	#####	3.8	6/1/2001	4.0	6/1/2001	3.9
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#####	3.7	#####	3.8	6/5/2001	4.0	6/5/2001	3.9
#####	3.7	#####	3.8	6/6/2001	4.0	6/6/2001	3.8
#####	3.7	#####	3.8	6/7/2001	4.0	6/7/2001	3.8
#####	3.7	#####	3.8	6/8/2001	3.9	6/8/2001	3.8
#####	3.8	#####	3.8	#####	3.9	#####	3.8
#####	3.8	#####	3.9	#####	3.9	#####	3.8
7/2/2001	3.8	7/2/2001	3.9	#####	3.9	#####	3.8
7/3/2001	3.8	7/3/2001	3.9	#####	3.9	#####	3.8
7/4/2001	3.8	7/4/2001	3.9	#####	3.8	#####	3.7
7/5/2001	3.8	7/5/2001	3.9	#####	3.8	#####	3.7
7/6/2001	3.8	7/6/2001	3.8	#####	3.8	#####	3.6
7/9/2001	3.8	7/9/2001	3.8	#####	3.7	#####	3.6
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5/2/2002	1.9	5/2/2002	1.8	4/5/2002	1.8	4/5/2002	1.9
5/3/2002	1.9	5/3/2002	1.8	4/8/2002	1.8	4/8/2002	1.9
5/7/2002	1.9	5/7/2002	1.8	4/9/2002	1.8	4/9/2002	1.9
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#####	1.1	#####	1.1	#####	1.0	#####	0.9
8/1/2003	1.1	8/1/2003	1.1	#####	1.0	#####	0.9
8/4/2003	1.1	8/4/2003	1.1	#####	1.0	#####	0.9
8/5/2003	1.1	8/5/2003	1.1	#####	0.9	#####	0.9
8/6/2003	1.1	8/6/2003	1.1	#####	0.9	#####	0.9
8/7/2003	1.1	8/7/2003	1.1	#####	1.1	#####	1.0
8/8/2003	1.1	8/8/2003	1.1	#####	1.1	#####	1.0
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#####	1.1	#####	1.1	7/2/2003	1.1	7/2/2003	1.1
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#####	1.1	#####	1.1	7/4/2003	#N/A	7/4/2003	#N/A
#####	1.1	#####	1.1	7/7/2003	1.1	7/7/2003	1.0
#####	1.1	#####	1.1	7/8/2003	1.1	7/8/2003	1.1
#####	1.1	#####	1.1	7/9/2003	1.1	7/9/2003	1.0
#####	1.1	#####	1.1	#####	1.0	#####	1.0
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#####	1.1	#####	1.1	#####	1.0	#####	1.0
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#####	1.1	#####	1.1	#####	1.1	#####	1.1
9/1/2003	1.1	9/1/2003	1.1	#####	1.0	#####	1.0
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9/3/2003	1.1	9/3/2003	1.1	#####	1.0	#####	1.0
9/4/2003	1.1	9/4/2003	1.1	#####	1.0	#####	1.0
9/5/2003	1.1	9/5/2003	1.1	#####	1.0	#####	1.0
9/8/2003	1.1	9/8/2003	1.1	#####	1.0	#####	1.0
9/9/2003	1.1	9/9/2003	1.1	#####	1.0	#####	1.0
#####	1.1	#####	1.1	#####	1.0	#####	1.1
#####	1.1	#####	1.1	#####	1.1	#####	1.1







4/1/2004	1.1	4/1/2004	1.1	#####	1.0	#####	1.1
4/2/2004	1.1	4/2/2004	1.1	#####	#N/A	#####	#N/A
4/5/2004	1.1	4/5/2004	1.1	#####	1.0	#####	1.0
4/6/2004	1.1	4/6/2004	1.1	#####	1.0	#####	1.0
4/7/2004	1.1	4/7/2004	1.1	#####	1.0	#####	1.1
4/8/2004	1.1	4/8/2004	1.1	#####	1.0	#####	1.0
#####	1.1	#####	1.1	#####	1.0	#####	1.0
#####	1.1	#####	1.1	#####	1.0	#####	1.0
#####	1.2	#####	1.1	#####	1.0	#####	1.0
#####	1.2	#####	1.1	#####	1.0	#####	1.0
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#####	1.2	#####	1.1	3/1/2004	1.0	3/1/2004	1.0
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#####	1.2	#####	1.1	3/4/2004	1.0	3/4/2004	1.1
#####	1.2	#####	1.1	3/5/2004	1.0	3/5/2004	1.0
#####	1.2	#####	1.1	3/8/2004	1.0	3/8/2004	1.0
#####	1.2	#####	1.1	3/9/2004	1.0	3/9/2004	1.0
#####	1.2	#####	1.1	#####	1.0	#####	1.0
#####	1.2	#####	1.1	#####	1.0	#####	1.0
5/4/2004	1.2	5/4/2004	1.1	#####	1.0	#####	1.0
5/5/2004	1.2	5/5/2004	1.1	#####	1.0	#####	1.0
5/6/2004	1.2	5/6/2004	1.1	#####	1.0	#####	1.0
5/7/2004	1.2	5/7/2004	1.1	#####	1.0	#####	1.0
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#####	1.3	#####	1.1	4/5/2004	1.0	4/5/2004	1.1
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6/2/2004	1.3	6/2/2004	1.1	4/9/2004	#N/A	4/9/2004	#N/A
6/3/2004	1.4	6/3/2004	1.2	#####	1.0	#####	1.1
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6/7/2004	1.4	6/7/2004	1.2	#####	1.0	#####	1.1
6/8/2004	1.4	6/8/2004	1.2	#####	1.0	#####	1.1
6/9/2004	1.4	6/9/2004	1.2	#####	1.0	#####	1.1
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1/5/2005	2.6	1/5/2005	2.4	#####	2.0	#####	2.2
1/6/2005	2.6	1/6/2005	2.4	#####	2.0	#####	2.2
1/7/2005	2.6	1/7/2005	2.4	#####	2.0	#####	2.2
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#####	2.7	#####	2.5	#####	2.1	#####	2.3
#####	2.7	#####	2.5	#####	2.1	#####	2.3
#####	2.7	#####	2.5	#####	2.1	#####	2.3
#####	2.7	#####	2.5	#####	2.1	#####	2.3
#####	2.7	#####	2.5	#####	2.1	#####	2.3
#####	2.7	#####	2.5	#####	2.1	#####	2.3
#####	2.7	#####	2.5	#####	2.1	#####	2.3
#####	2.7	#####	2.5	#####	#N/A	#####	#N/A
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#####	2.7	#####	2.6	#####	2.2	#####	2.3
#####	2.7	#####	2.6	#####	2.2	#####	2.3
#####	2.7	#####	2.6	#####	2.2	#####	2.3
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2/2/2005	2.8	2/2/2005	2.6	#####	2.3	#####	2.4
2/3/2005	2.8	2/3/2005	2.6	#####	2.3	#####	2.4
2/4/2005	2.8	2/4/2005	2.6	#####	2.3	#####	2.4
2/7/2005	2.8	2/7/2005	2.6	#####	2.3	#####	2.4
2/8/2005	2.8	2/8/2005	2.6	#####	2.3	#####	2.4
2/9/2005	2.8	2/9/2005	2.6	#####	2.3	#####	2.4
#####	2.8	#####	2.6	#####	2.3	#####	2.4
#####	2.8	#####	2.6	#####	2.4	#####	2.4
#####	2.8	#####	2.6	#####	2.3	#####	2.4
#####	2.8	#####	2.6	#####	2.4	#####	2.5
#####	2.8	#####	2.6	#####	2.3	#####	2.5
#####	2.8	#####	2.6	#####	2.3	#####	2.5
#####	2.8	#####	2.6	#####	2.3	#####	2.5
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3/1/2005	2.9	3/1/2005	2.7	#####	2.3	#####	2.5
3/2/2005	2.9	3/2/2005	2.7	1/3/2005	2.3	1/3/2005	2.5
3/3/2005	3.0	3/3/2005	2.7	1/4/2005	2.3	1/4/2005	2.5
3/4/2005	3.0	3/4/2005	2.8	1/5/2005	2.3	1/5/2005	2.5
3/7/2005	3.0	3/7/2005	2.8	1/6/2005	2.4	1/6/2005	2.6

3/8/2005	3.0	3/8/2005	2.8	1/7/2005	2.4	1/7/2005	2.6
3/9/2005	3.0	3/9/2005	2.8	#####	2.4	#####	2.6
#####	3.0	#####	2.8	#####	2.4	#####	2.6
#####	3.0	#####	2.8	#####	2.4	#####	2.6
#####	3.0	#####	2.8	#####	2.4	#####	2.6
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4/1/2005	3.1	4/1/2005	2.9	#####	2.5	#####	2.7
4/4/2005	3.1	4/4/2005	2.9	2/1/2005	2.5	2/1/2005	2.7
4/5/2005	3.1	4/5/2005	2.9	2/2/2005	2.5	2/2/2005	2.7
4/6/2005	3.1	4/6/2005	2.9	2/3/2005	2.5	2/3/2005	2.7
4/7/2005	3.1	4/7/2005	2.9	2/4/2005	2.5	2/4/2005	2.7
4/8/2005	3.1	4/8/2005	2.9	2/7/2005	2.5	2/7/2005	2.7
#####	3.1	#####	2.9	2/8/2005	2.5	2/8/2005	2.7
#####	3.1	#####	3.0	2/9/2005	2.5	2/9/2005	2.7
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#####	3.2	#####	3.0	#####	2.5	#####	2.7
#####	3.1	#####	3.0	#####	2.5	#####	2.7
#####	3.2	#####	3.0	#####	2.5	#####	2.8
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5/3/2005	3.2	5/3/2005	3.1	3/1/2005	2.7	3/1/2005	2.9
5/4/2005	3.2	5/4/2005	3.1	3/2/2005	2.7	3/2/2005	2.9
5/5/2005	3.2	5/5/2005	3.1	3/3/2005	2.7	3/3/2005	2.9
5/6/2005	3.2	5/6/2005	3.1	3/4/2005	2.7	3/4/2005	2.9
5/9/2005	3.3	5/9/2005	3.1	3/7/2005	2.7	3/7/2005	2.9
#####	3.3	#####	3.1	3/8/2005	2.7	3/8/2005	2.9
#####	3.3	#####	3.1	3/9/2005	2.7	3/9/2005	2.9
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#####	3.7	#####	3.5	#####	3.0	#####	3.2
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8/2/2005	3.7	8/2/2005	3.5	#####	#N/A	#####	#N/A
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8/4/2005	3.7	8/4/2005	3.6	6/1/2005	3.1	6/1/2005	3.3
8/5/2005	3.8	8/5/2005	3.6	6/2/2005	3.1	6/2/2005	3.3
8/8/2005	3.8	8/8/2005	3.6	6/3/2005	3.1	6/3/2005	3.3
8/9/2005	3.8	8/9/2005	3.6	6/6/2005	3.1	6/6/2005	3.3
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9/2/2005	3.8	9/2/2005	3.7	#####	3.3	#####	3.4
9/5/2005	3.8	9/5/2005	3.7	#####	3.3	#####	3.5
9/6/2005	3.8	9/6/2005	3.7	7/1/2005	3.3	7/1/2005	3.5
9/7/2005	3.8	9/7/2005	3.7	7/4/2005	#N/A	7/4/2005	#N/A
9/8/2005	3.8	9/8/2005	3.7	7/5/2005	3.3	7/5/2005	3.5
9/9/2005	3.9	9/9/2005	3.7	7/6/2005	3.3	7/6/2005	3.5
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#####	4.3 #####	4.1 9/8/2005	3.7 9/8/2005	3.8
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#####	4.5	#####	4.4	#####	3.9	#####	4.0
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#####	2.9	#####	2.9	#####	5.4	#####	5.3
#####	2.8	#####	2.8	#####	5.3	#####	5.2
#####	2.8	#####	2.8	#####	5.2	#####	5.2
#####	2.6	#####	2.6	#####	5.2	#####	5.2
#####	2.5	#####	2.5	#####	5.3	#####	5.3
#####	2.6	#####	2.6	#####	5.2	#####	5.2
#####	2.6	#####	2.6	#####	5.2	#####	5.2
#####	2.7	#####	2.7	#####	5.2	#####	5.2
#####	2.7	#####	2.7	#####	5.1	#####	5.1
#####	2.7	#####	2.7	#####	#N/A	#####	#N/A
#####	2.7	#####	2.7	#####	#N/A	#####	#N/A
#####	2.7	#####	2.7	#####	5.1	#####	5.1
4/1/2008	2.7	4/1/2008	2.7	#####	5.1	#####	5.1
4/2/2008	2.7	4/2/2008	2.7	#####	4.7	#####	4.9
4/3/2008	2.7	4/3/2008	2.7	#####	4.7	#####	4.9
4/4/2008	2.7	4/4/2008	2.7	1/1/2008	#N/A	1/1/2008	#N/A
4/7/2008	2.7	4/7/2008	2.7	1/2/2008	4.7	1/2/2008	4.7
4/8/2008	2.7	4/8/2008	2.7	1/3/2008	4.6	1/3/2008	4.8
4/9/2008	2.7	4/9/2008	2.7	1/4/2008	4.6	1/4/2008	4.8
#####	2.7	#####	2.7	1/7/2008	4.5	1/7/2008	4.6
#####	2.7	#####	2.7	1/8/2008	4.5	1/8/2008	4.6
#####	2.7	#####	2.7	1/9/2008	4.4	1/9/2008	4.4
#####	2.7	#####	2.7	#####	4.4	#####	4.4
#####	2.7	#####	2.7	#####	4.3	#####	4.3
#####	2.8	#####	2.8	#####	4.1	#####	4.1
#####	2.9	#####	2.9	#####	4.1	#####	4.1
#####	2.9	#####	2.9	#####	4.0	#####	3.9
#####	2.9	#####	2.9	#####	4.0	#####	4.0
#####	2.9	#####	2.9	#####	4.0	#####	3.9
#####	2.9	#####	2.9	#####	#N/A	#####	#N/A
#####	2.9	#####	2.9	#####	3.8	#####	3.7
#####	2.9	#####	2.9	#####	3.3	#####	3.3
#####	2.9	#####	2.8	#####	3.3	#####	3.3
#####	2.9	#####	2.8	#####	3.3	#####	3.3
5/1/2008	2.8	5/1/2008	2.7	#####	3.3	#####	3.3
5/2/2008	2.8	5/2/2008	2.7	#####	3.3	#####	3.3
5/6/2008	2.8	5/6/2008	2.7	#####	3.3	#####	3.3

5/7/2008	2.7	5/7/2008	2.6	#####	3.2	#####	3.2
5/8/2008	2.7	5/8/2008	2.6	2/1/2008	3.2	2/1/2008	3.2
5/9/2008	2.7	5/9/2008	2.6	2/4/2008	3.3	2/4/2008	3.2
#####	2.7	#####	2.5	2/5/2008	3.3	2/5/2008	3.3
#####	2.7	#####	2.5	2/6/2008	3.3	2/6/2008	3.2
#####	2.7	#####	2.5	2/7/2008	3.2	2/7/2008	3.1
#####	2.7	#####	2.5	2/8/2008	3.2	2/8/2008	3.1
#####	2.7	#####	2.5	#####	3.1	#####	3.1
#####	2.7	#####	2.5	#####	3.1	#####	3.1
#####	2.7	#####	2.4	#####	3.1	#####	3.1
#####	2.6	#####	2.4	#####	3.2	#####	3.1
#####	2.6	#####	2.4	#####	3.2	#####	3.1
#####	2.6	#####	2.4	#####	#N/A	#####	#N/A
#####	2.6	#####	2.4	#####	3.2	#####	3.1
#####	2.6	#####	2.4	#####	3.2	#####	3.1
#####	2.7	#####	2.5	#####	3.2	#####	3.2
#####	2.7	#####	2.5	#####	3.2	#####	3.1
6/2/2008	2.7	6/2/2008	2.5	#####	3.2	#####	3.1
6/3/2008	2.7	6/3/2008	2.5	#####	3.2	#####	3.1
6/4/2008	2.7	6/4/2008	2.5	#####	3.2	#####	3.1
6/5/2008	2.7	6/5/2008	2.4	#####	3.2	#####	3.1
6/6/2008	2.7	6/6/2008	2.4	#####	3.2	#####	3.1
6/9/2008	2.7	6/9/2008	2.4	3/3/2008	3.1	3/3/2008	3.1
#####	2.8	#####	2.5	3/4/2008	3.1	3/4/2008	3.1
#####	2.8	#####	2.5	3/5/2008	3.1	3/5/2008	3.1
#####	2.8	#####	2.5	3/6/2008	3.1	3/6/2008	3.0
#####	2.8	#####	2.5	3/7/2008	3.0	3/7/2008	3.0
#####	2.8	#####	2.5	#####	3.0	#####	2.9
#####	2.8	#####	2.5	#####	2.9	#####	2.9
#####	2.8	#####	2.5	#####	2.9	#####	2.9
#####	2.8	#####	2.5	#####	2.8	#####	2.9
#####	2.8	#####	2.5	#####	2.7	#####	2.8
#####	2.8	#####	2.5	#####	2.6	#####	2.6
#####	2.8	#####	2.5	#####	2.6	#####	2.7
#####	2.8	#####	2.5	#####	2.7	#####	2.7
#####	2.8	#####	2.5	#####	2.7	#####	2.7
#####	2.8	#####	2.5	#####	#N/A	#####	#N/A
#####	2.8	#####	2.5	#####	2.7	#####	2.7
7/1/2008	2.8	7/1/2008	2.5	#####	2.8	#####	2.8
7/2/2008	2.8	7/2/2008	2.5	#####	2.8	#####	2.8
7/3/2008	2.8	7/3/2008	2.5	#####	2.9	#####	2.9
7/4/2008	2.8	7/4/2008	2.5	#####	2.9	#####	3.0
7/7/2008	2.8	7/7/2008	2.5	#####	3.0	#####	3.0
7/8/2008	2.8	7/8/2008	2.5	4/1/2008	3.0	4/1/2008	3.0
7/9/2008	2.8	7/9/2008	2.5	4/2/2008	3.0	4/2/2008	3.0
#####	2.8	#####	2.5	4/3/2008	3.0	4/3/2008	3.0
#####	2.8	#####	2.5	4/4/2008	3.0	4/4/2008	3.0

#####	2.8	#####	2.5	4/7/2008	3.0	4/7/2008	3.0
#####	2.8	#####	2.5	4/8/2008	3.0	4/8/2008	3.0
#####	2.8	#####	2.5	4/9/2008	3.0	4/9/2008	3.0
#####	2.8	#####	2.5	#####	3.0	#####	3.0
#####	2.8	#####	2.5	#####	3.0	#####	3.0
#####	2.8	#####	2.5	#####	2.9	#####	2.9
#####	2.8	#####	2.5	#####	2.9	#####	2.9
#####	2.8	#####	2.5	#####	2.9	#####	3.0
#####	2.8	#####	2.5	#####	2.9	#####	3.0
#####	2.8	#####	2.5	#####	3.0	#####	3.1
#####	2.8	#####	2.5	#####	3.0	#####	3.1
#####	2.8	#####	2.5	#####	3.0	#####	3.1
#####	2.8	#####	2.5	#####	3.0	#####	3.1
8/1/2008	2.8	8/1/2008	2.5	#####	3.0	#####	3.1
8/4/2008	2.8	8/4/2008	2.5	#####	3.0	#####	3.2
8/5/2008	2.8	8/5/2008	2.5	#####	2.9	#####	3.2
8/6/2008	2.8	8/6/2008	2.5	#####	2.9	#####	3.2
8/7/2008	2.8	8/7/2008	2.5	5/1/2008	2.9	5/1/2008	3.0
8/8/2008	2.8	8/8/2008	2.5	5/2/2008	2.9	5/2/2008	2.9
#####	2.8	#####	2.5	5/5/2008	2.9	5/5/2008	2.9
#####	2.8	#####	2.5	5/6/2008	2.9	5/6/2008	2.9
#####	2.8	#####	2.5	5/7/2008	2.8	5/7/2008	2.9
#####	2.8	#####	2.5	5/8/2008	2.8	5/8/2008	2.9
#####	2.8	#####	2.5	5/9/2008	2.7	5/9/2008	2.8
#####	2.8	#####	2.5	#####	2.6	#####	2.9
#####	2.8	#####	2.5	#####	2.6	#####	2.8
#####	2.8	#####	2.5	#####	2.6	#####	2.9
#####	2.8	#####	2.5	#####	2.6	#####	2.9
#####	2.8	#####	2.5	#####	2.6	#####	2.9
#####	2.8	#####	2.5	#####	2.6	#####	2.8
#####	2.8	#####	2.5	#####	2.5	#####	2.8
#####	2.8	#####	2.5	#####	2.5	#####	2.8
9/1/2008	2.8	9/1/2008	2.5	#####	2.5	#####	2.8
9/2/2008	2.8	9/2/2008	2.5	#####	#N/A	#####	#N/A
9/3/2008	2.8	9/3/2008	2.5	#####	2.5	#####	2.8
9/4/2008	2.8	9/4/2008	2.5	#####	2.5	#####	2.8
9/5/2008	2.8	9/5/2008	2.5	#####	2.6	#####	2.9
9/8/2008	2.8	9/8/2008	2.5	#####	2.6	#####	2.9
9/9/2008	2.8	9/9/2008	2.5	6/2/2008	2.6	6/2/2008	2.9
#####	2.8	#####	2.5	6/3/2008	2.6	6/3/2008	2.9
#####	2.8	#####	2.5	6/4/2008	2.6	6/4/2008	2.9
#####	2.8	#####	2.5	6/5/2008	2.6	6/5/2008	2.9
#####	2.8	#####	2.5	6/6/2008	2.7	6/6/2008	2.9
#####	2.9	#####	2.7	6/9/2008	2.7	6/9/2008	2.9
#####	3.1	#####	3.0	#####	2.7	#####	2.9

#####	3.2	#####	3.2	#####	2.7	#####	2.9
#####	3.2	#####	3.2	#####	2.7	#####	3.0
#####	3.2	#####	3.2	#####	2.7	#####	3.0
#####	3.2	#####	3.2	#####	2.8	#####	3.1
#####	3.5	#####	3.4	#####	2.7	#####	3.1
#####	3.8	#####	3.7	#####	2.7	#####	3.0
#####	3.8	#####	3.7	#####	2.7	#####	3.0
#####	3.9	#####	3.7	#####	2.7	#####	3.0
#####	4.1	#####	3.9	#####	2.7	#####	3.0
#####	4.2	#####	4.0	#####	2.7	#####	3.0
#####	4.2	#####	4.0	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.7	#####	3.0
#####	4.3	#####	4.1	#####	2.6	#####	3.0
#####	4.5	#####	4.3	7/1/2008	2.7	7/1/2008	3.0
#####	4.8	#####	4.5	7/2/2008	2.7	7/2/2008	3.0
#####	4.8	#####	4.6	7/3/2008	2.7	7/3/2008	3.0
#####	4.8	#####	4.6	7/4/2008	#N/A	7/4/2008	#N/A
#####	4.6	#####	4.5	7/7/2008	2.7	7/7/2008	3.0
#####	4.6	#####	4.4	7/8/2008	2.7	7/8/2008	3.0
#####	4.5	#####	4.3	7/9/2008	2.7	7/9/2008	3.0
#####	4.4	#####	4.2	#####	2.7	#####	3.0
#####	4.1	#####	3.8	#####	2.7	#####	3.0
#####	3.8	#####	3.5	#####	2.7	#####	3.0
#####	3.5	#####	3.3	#####	2.7	#####	3.0
#####	3.5	#####	3.3	#####	2.7	#####	3.0
#####	3.5	#####	3.2	#####	2.7	#####	3.0
#####	3.5	#####	3.2	#####	2.6	#####	3.0
#####	3.5	#####	3.2	#####	2.7	#####	3.0
#####	3.4	#####	3.1	#####	2.7	#####	3.0
#####	3.2	#####	2.9	#####	2.7	#####	3.0
#####	3.0	#####	2.6	#####	2.7	#####	3.0
#####	2.9	#####	2.4	#####	2.7	#####	3.0
#####	2.7	#####	2.2	#####	2.7	#####	3.0
#####	2.5	#####	2.0	#####	2.7	#####	3.0
#####	2.4	#####	1.8	#####	2.7	#####	3.0
#####	2.3	#####	1.6	#####	2.7	#####	3.0
#####	2.2	#####	1.5	8/1/2008	2.6	8/1/2008	3.0
#####	2.2	#####	1.5	8/4/2008	2.6	8/4/2008	3.0
#####	2.1	#####	1.4	8/5/2008	2.6	8/5/2008	3.0
#####	2.1	#####	1.4	8/6/2008	2.7	8/6/2008	3.0
#####	2.2	#####	1.5	8/7/2008	2.6	8/7/2008	3.0
#####	2.2	#####	1.5	8/8/2008	2.6	8/8/2008	3.0
#####	2.2	#####	1.5	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0

#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.4	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.6	#####	3.0
#####	2.2	#####	1.9	#####	2.7	#####	3.0
#####	2.2	#####	1.8	#####	2.7	#####	3.0
#####	2.2	#####	1.6	9/1/2008	#N/A	9/1/2008	#N/A
#####	2.1	#####	1.4	9/2/2008	2.6	9/2/2008	3.0
#####	2.0	#####	1.2	9/3/2008	2.6	9/3/2008	3.0
#####	1.9	#####	1.0	9/4/2008	2.6	9/4/2008	3.0
#####	1.9	#####	1.0	9/5/2008	2.6	9/5/2008	3.0
#####	1.8	#####	0.9	9/8/2008	2.7	9/8/2008	3.0
#####	1.6	#####	0.6	9/9/2008	2.7	9/9/2008	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.6	#####	3.0
#####	1.5	#####	0.5	#####	2.7	#####	3.0
#####	1.5	#####	0.5	#####	3.2	#####	3.2
#####	1.5	#####	0.5	#####	3.8	#####	3.8
#####	1.4	#####	0.4	#####	6.0	#####	5.0
#####	1.4	#####	0.4	#####	6.0	#####	5.0
1/2/2009	1.4	1/2/2009	0.4	#####	5.0	#####	5.0
1/5/2009	1.4	1/5/2009	0.4	#####	5.3	#####	5.0
1/6/2009	1.4	1/6/2009	0.4	#####	5.3	#####	5.0
1/7/2009	1.4	1/7/2009	0.4	#####	5.5	#####	5.0
1/8/2009	1.4	1/8/2009	0.4	#####	5.5	#####	5.0
1/9/2009	1.3	1/9/2009	0.4	#####	5.5	#####	5.0
#####	1.2	#####	0.3	#####	7.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.3	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.1	#####	0.4	#####	6.5	#####	6.0
#####	1.1	#####	0.4	#####	7.0	#####	6.0
#####	1.1	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	6.0	#####	6.0
#####	1.2	#####	0.4	#####	#N/A	#####	#N/A
#####	1.2	#####	0.4	#####	5.8	#####	6.0
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.5	#####	5.8
#####	1.2	#####	0.4	#####	5.0	#####	5.8
#####	1.2	#####	0.4	#####	4.3	#####	5.0

2/2/2009	1.2	2/2/2009	0.4	#####	4.0	#####	4.5
2/3/2009	1.2	2/3/2009	0.4	#####	3.8	#####	4.5
2/4/2009	1.2	2/4/2009	0.4	#####	3.8	#####	4.5
2/5/2009	1.2	2/5/2009	0.4	#####	3.8	#####	4.5
2/6/2009	1.2	2/6/2009	0.4	#####	3.8	#####	4.5
2/9/2009	1.2	2/9/2009	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.4	#####	3.8	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	3.3	#####	4.5
#####	1.2	#####	0.5	#####	2.8	#####	4.3
#####	1.2	#####	0.5	#####	2.5	#####	4.0
#####	1.2	#####	0.5	#####	2.3	#####	3.3
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	2.0	#####	3.0
#####	1.2	#####	0.5	#####	#N/A	#####	#N/A
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	2.8
#####	1.3	#####	0.5	#####	2.0	#####	3.0
#####	1.3	#####	0.5	#####	1.8	#####	3.0
3/2/2009	1.3	3/2/2009	0.5	#####	1.8	#####	3.0
3/3/2009	1.3	3/3/2009	0.5	#####	1.8	#####	3.0
3/4/2009	1.3	3/4/2009	0.5	#####	1.8	#####	3.0
3/5/2009	1.3	3/5/2009	0.5	#####	1.9	#####	3.0
3/6/2009	1.3	3/6/2009	0.5	#####	2.0	#####	3.0
3/9/2009	1.3	3/9/2009	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	2.0	#####	3.0
#####	1.3	#####	0.6	#####	#N/A	#####	#N/A
#####	1.3	#####	0.6	#####	2.8	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.6	#####	3.0	#####	3.0
#####	1.3	#####	0.5	#####	2.6	#####	3.0
#####	1.2	#####	0.5	#####	2.7	#####	3.0
#####	1.2	#####	0.5	#####	2.3	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	2.2	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	3.0
#####	1.2	#####	0.5	#####	1.8	#####	2.9
#####	1.2	#####	0.5	#####	1.5	#####	2.6
#####	1.2	#####	0.5	#####	1.3	#####	2.2
#####	1.2	#####	0.5	#####	1.3	#####	2.0
4/1/2009	1.2	4/1/2009	0.5	#####	1.3	#####	2.0
4/2/2009	1.2	4/2/2009	0.5	#####	1.3	#####	2.0
4/3/2009	1.2	4/3/2009	0.5	#####	1.3	#####	2.0
4/6/2009	1.2	4/6/2009	0.5	#####	1.2	#####	2.0
4/7/2009	1.1	4/7/2009	0.5	#####	1.2	#####	2.0



#####	0.6	#####	0.3	3/2/2009	0.8	3/2/2009	1.7
#####	0.6	#####	0.3	3/3/2009	0.9	3/3/2009	1.7
#####	0.6	#####	0.3	3/4/2009	0.8	3/4/2009	1.7
#####	0.6	#####	0.3	3/5/2009	0.8	3/5/2009	1.7
#####	0.6	#####	0.3	3/6/2009	0.8	3/6/2009	1.7
#####	0.6	#####	0.3	3/9/2009	0.9	3/9/2009	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
#####	0.6	#####	0.3	#####	1.0	#####	1.7
7/1/2009	0.6	7/1/2009	0.3	#####	1.0	#####	1.7
7/2/2009	0.6	7/2/2009	0.3	#####	1.0	#####	1.7
7/3/2009	0.6	7/3/2009	0.3	#####	1.0	#####	1.7
7/6/2009	0.5	7/6/2009	0.3	#####	1.0	#####	1.7
7/7/2009	0.5	7/7/2009	0.3	#####	1.0	#####	1.6
7/8/2009	0.5	7/8/2009	0.3	#####	1.0	#####	1.6
7/9/2009	0.5	7/9/2009	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.6	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	#####	1.0	#####	1.6
#####	0.5	#####	0.3	4/1/2009	1.0	4/1/2009	1.6
#####	0.5	#####	0.3	4/2/2009	1.0	4/2/2009	1.6
#####	0.5	#####	0.3	4/3/2009	1.0	4/3/2009	1.6
#####	0.5	#####	0.3	4/6/2009	1.0	4/6/2009	1.6
#####	0.5	#####	0.3	4/7/2009	1.0	4/7/2009	1.6
#####	0.5	#####	0.3	4/8/2009	1.0	4/8/2009	1.6
#####	0.5	#####	0.3	4/9/2009	0.8	4/9/2009	1.5
#####	0.5	#####	0.3	#####	#N/A	#####	#N/A
#####	0.5	#####	0.3	#####	0.8	#####	1.5
#####	0.5	#####	0.3	#####	1.0	#####	1.5
8/3/2009	0.5	8/3/2009	0.3	#####	1.0	#####	1.5
8/4/2009	0.5	8/4/2009	0.3	#####	1.0	#####	1.5
8/5/2009	0.5	8/5/2009	0.3	#####	1.0	#####	1.5
8/6/2009	0.5	8/6/2009	0.3	#####	1.0	#####	1.5
8/7/2009	0.5	8/7/2009	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.5	#####	0.3	#####	0.9	#####	1.5
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	#####	0.9	#####	1.4
#####	0.4	#####	0.3	5/1/2009	0.9	5/1/2009	1.4
#####	0.4	#####	0.3	5/4/2009	0.9	5/4/2009	1.4
#####	0.4	#####	0.3	5/5/2009	0.8	5/5/2009	1.4





















7/6/2011	0.2	7/6/2011	0.2	#####	0.3	#####	0.4
7/7/2011	0.2	7/7/2011	0.2	#####	0.3	#####	0.4
7/8/2011	0.2	7/8/2011	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	#####	0.3	#####	0.4
#####	0.2	#####	0.2	3/1/2011	0.3	3/1/2011	0.4
#####	0.2	#####	0.2	3/2/2011	0.3	3/2/2011	0.4
#####	0.2	#####	0.2	3/3/2011	0.3	3/3/2011	0.4
#####	0.2	#####	0.2	3/4/2011	0.3	3/4/2011	0.4
#####	0.3	#####	0.2	3/7/2011	0.3	3/7/2011	0.4
#####	0.3	#####	0.2	3/8/2011	0.3	3/8/2011	0.4
#####	0.3	#####	0.2	3/9/2011	0.3	3/9/2011	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
8/1/2011	0.3	8/1/2011	0.2	#####	0.3	#####	0.4
8/2/2011	0.3	8/2/2011	0.2	#####	0.3	#####	0.4
8/3/2011	0.3	8/3/2011	0.2	#####	0.3	#####	0.4
8/4/2011	0.3	8/4/2011	0.2	#####	0.3	#####	0.4
8/5/2011	0.3	8/5/2011	0.2	#####	0.3	#####	0.4
8/8/2011	0.3	8/8/2011	0.2	#####	0.3	#####	0.4
8/9/2011	0.3	8/9/2011	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	4/1/2011	0.3	4/1/2011	0.4
#####	0.3	#####	0.2	4/4/2011	0.3	4/4/2011	0.4
#####	0.3	#####	0.2	4/5/2011	0.3	4/5/2011	0.4
#####	0.3	#####	0.2	4/6/2011	0.3	4/6/2011	0.4
#####	0.3	#####	0.2	4/7/2011	0.3	4/7/2011	0.4
#####	0.3	#####	0.2	4/8/2011	0.3	4/8/2011	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.2	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
#####	0.3	#####	0.2	#####	0.3	#####	0.4
9/1/2011	0.3	9/1/2011	0.2	#####	0.3	#####	0.4
9/2/2011	0.3	9/2/2011	0.2	#####	0.3	#####	0.4
9/5/2011	0.3	9/5/2011	0.2	#####	0.3	#####	0.4
9/6/2011	0.3	9/6/2011	0.2	#####	0.3	#####	0.4
9/7/2011	0.3	9/7/2011	0.2	#####	0.3	#####	0.4
9/8/2011	0.3	9/8/2011	0.2	#####	0.3	#####	0.4
9/9/2011	0.3	9/9/2011	0.2	#####	0.3	#####	0.4

















I-26

[London](#)

Reserve System

Underwriter	Security purchased by the Enterprise	LIBOR-Based Interest Rate	CUSIP	Risk Factors language: Underwriters may rip you off by manipulating your reference index	Reviewer
Bank of America	BAFC 2007	1mL + 16	05952DAA1	FALSE	Timothy Lee
Barclays Capital	FHLT 2005	1mL + 26	35729PMA	FALSE	Timothy Lee
		Tied to mortgage rates, which are keyed inter alia to 6m and 12m			
Citibank	CMLTI 200	LIBOR	17312YAB8	FALSE	Timothy Lee
Deutsche Bank	DBALT 200	1mL + 19	25151XAE1	FALSE	Timothy Lee
JPMorgan	JPMAC 200	1mL + 13	46630BAA4	FALSE	Timothy Lee
RBS	OOMLT 200	1mL + 14	68402YAA4	FALSE	Timothy Lee
UBS	MABS 200	1mL + 25	57643LJR8	FALSE	Timothy Lee
HSBC	FFML 2006	1mL + 13	32028PAA3	FALSE	Timothy Lee

## **RE: LIBOR Excel sheet**

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**Item ID:** 32171  
**From:** Parker, Richard (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Bloch, David (b) (6)  
**Subject:** RE: LIBOR Excel sheet  
**Sent:** October 29, 2012 5:57 PM  
**Received:** October 29, 2012 5:57 PM

David, What say you, partner? Rich  
From: Lee, Timothy Sent: Monday, October 29, 2012 4:46 PM To: Parker, Richard  
Cc: Bloch, David Subject: LIBOR Excel sheet  
Hi Old Salt, With a little spare time on my hands today, I went back and triple-checked all the numbers in the LIBOR analysis. I have also hyperlinked all the numbers I used to specific tables in the financial statements, so that anyone who wants to can click through and see immediately where I got my numbers. This obviates anybody else's need to recheck the Excel sheet. At this point, I am perfectly content to distribute this file along with the memo when authorized. In fact, for the sake of transparency, I recommend we do exactly that. This file is also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## FW: Libor

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**Item ID:** 32172  
**From:** (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Parker, Richard (b) (6)  
**Subject:** FW: Libor  
**Sent:** October 31, 2012 8:53 PM  
**Received:** October 31, 2012 8:53 PM

Tim,  
Could you provide Emilia with the latest draft of the Libor memo?

Thanks,

(b) (6)

Sent from my Windows Phone

**From:**  
Parker, Richard  
**Sent:**  
10/31/2012 6:41 PM  
**To:**

(b) (6)

**Subject:**

RE: Libor

Isn't the most recent version a combined product? Tim would know . . .

Sent from my Windows Phone

**From:**  
(b) (6)  
**Sent:**  
10/31/2012 5:58 PM  
**To:**

Parker, Richard; DiSanto, Emilia

**Subject:**

RE: Libor

Sorry, here is the cover memo, as well.

**From:** (b) (6)  
**Sent:** Wednesday, October 31, 2012 5:53 PM  
**To:** Parker, Richard; DiSanto, Emilia  
**Subject:** RE: Libor

It looks like this version, last modified on Oct 24, is the most recent one on SharePoint.

**From:** Parker, Richard  
**Sent:** Wednesday, October 31, 2012 5:47 PM  
**To:** DiSanto, Emilia (b) (6)  
**Subject:** RE: Libor

Most recent is on SharePoint with your changes to the cover memo. It is indexed. (b) (6) will help if necessary. Otherwise I'll help as soon as I arrive home

Sent from my Windows Phone  
**From:**  
DiSanto, Emilia  
**Sent:**  
10/31/2012 5:16 PM  
**To:**

Linick, Steve; Parker, Richard

Subject:

FW: Libor

This is the most recent of what I haveâ€¦Rich can you please confirm that this is the most recent version of the Libor memo ..thx

## RE: Libor

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**Item ID:** 32173  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7c708af923dc48348ff2d1ae45bece6c-(b) (6)>, Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** RE: Libor  
**Sent:** November 1, 2012 9:09 AM  
**Received:** November 1, 2012 9:09 AM

The latest draft I have is my comments to the unified document, sent to Rich on October 25. Unless otherwise asked, I will clean up the document, PDF it, and send to Emilia. I will also pretty up the Excel document with an eye to future distribution. From: (b) (6) Sent: Wednesday, October 31, 2012 8:54 PM To: Lee, Timothy; Parker, Richard Subject: FW: Libor Tim, Could you provide Emilia with the latest draft of the Libor memo? Thanks, (b) (6) Sent from my Windows Phone From: Parker, Richard Sent: 10/31/2012 6:41 PM To: (b) (6) Subject: RE: Libor Isn't the most recent version a combined product? Tim would know . . . Sent from my Windows Phone From: (b) (6) Sent: 10/31/2012 5:58 PM To: Parker, Richard; DiSanto, Emilia Subject: RE: Libor Sorry, here is the cover memo, as well. From: (b) (6) Sent: Wednesday, October 31, 2012 5:53 PM To: Parker, Richard; DiSanto, Emilia Subject: RE: Libor It looks like this version, last modified on Oct 24, is the most recent one on SharePoint. From: Parker, Richard Sent: Wednesday, October 31, 2012 5:47 PM To: DiSanto, Emilia (b) (6) Subject: RE: Libor Most recent is on SharePoint with your changes to the cover memo. It is indexed. (b) (6) will help if necessary. Otherwise I'll help as soon as I arrive home Sent from my Windows Phone From: DiSanto, Emilia Sent: 10/31/2012 5:16 PM To: Linick, Steve; Parker, Richard Subject: FW: Libor This is the most recent of what I have...Rich can you please confirm that this is the most recent version of the Libor memo ..thx

## RE: Libor

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**Item ID:** 32174  
**From:** (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaig.gov>, Parker, Richard (b) (6)  
**Subject:** RE: Libor  
**Sent:** November 1, 2012 9:16 AM  
**Received:** November 1, 2012 9:16 AM

I asked Em and she said to clean it up and send it along this morning. From: Lee, Timothy Sent: Thursday, November 01, 2012 9:09 AM To: (b) (6); Parker, Richard Subject: RE: Libor The latest draft I have is my comments to the unified document, sent to Rich on October 25. Unless otherwise asked, I will clean up the document, PDF it, and send to Emilia. I will also pretty up the Excel document with an eye to future distribution. From: (b) (6) Sent: Wednesday, October 31, 2012 8:54 PM To: Lee, Timothy; Parker, Richard Subject: FW: Libor Tim, Could you provide Emilia with the latest draft of the Libor memo? Thanks, (b) (6) Sent from my Windows Phone From: Parker, Richard Sent: 10/31/2012 6:41 PM To: (b) (6) Subject: RE: Libor Isn't the most recent version a combined product? Tim would know . . . Sent from my Windows Phone From: (b) (6) Sent: 10/31/2012 5:58 PM To: Parker, Richard; DiSanto, Emilia Subject: RE: Libor Sorry, here is the cover memo, as well. From: (b) (6) Sent: Wednesday, October 31, 2012 5:53 PM To: Parker, Richard; DiSanto, Emilia Subject: RE: Libor It looks like this version, last modified on Oct 24, is the most recent one on SharePoint. From: Parker, Richard Sent: Wednesday, October 31, 2012 5:47 PM To: DiSanto, Emilia; (b) (6) Subject: RE: Libor Most recent is on SharePoint with your changes to the cover memo. It is indexed. (b) (6) will help if necessary. Otherwise I'll help as soon as I arrive home Sent from my Windows Phone From: DiSanto, Emilia Sent: 10/31/2012 5:16 PM To: Linick, Steve; Parker, Richard Subject: FW: Libor This is the most recent of what I have...Rich can you please confirm that this is the most recent version of the Libor memo ..thx

## LIBOR memo

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**Item ID:** 32176  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** DiSanto, Emilia </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d94639648c304c1d8447667da03493cb-Emilia DiSa>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7c708af923dc48348ff2d1ae45bece6c- (b) (6) >  
**Subject:** LIBOR memo  
**Sent:** November 1, 2012 9:37 AM  
**Received:** November 1, 2012 9:37 AM

Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint.  
Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR memo package proposed final.pdf**

**Original view**

14 pages (displayed on pages 3 to 16)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** November 1, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to alleged manipulation of the London Interbank Offered Rate (LIBOR) by a number of major financial institutions. As you know, on June 27, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation at other institutions are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11 they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. My staff has tentatively estimated that the Enterprises may have suffered \$3 billion in such losses. Those losses, of course, would have been funded by the Department of the Treasury under the Senior Preferred Stock Purchase Agreements in place with each Enterprise. I therefore believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of my staff in this regard.



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis, Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, “[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)” July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### Analysis

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

---

<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

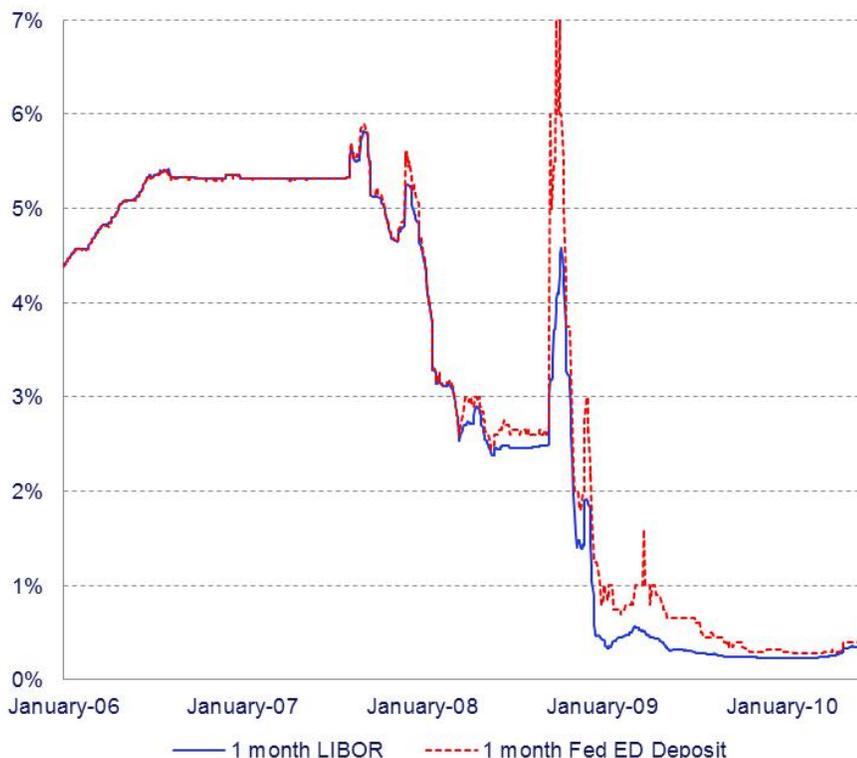
As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1

illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

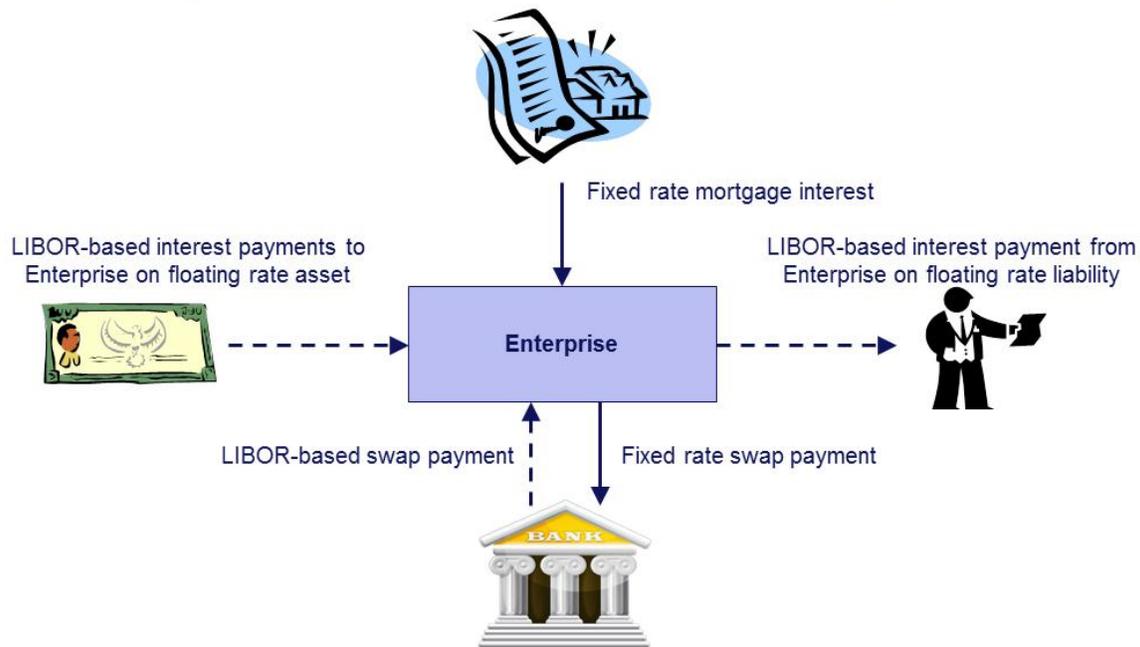
**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 2. LIBOR-Based Payments to and From the Enterprises**



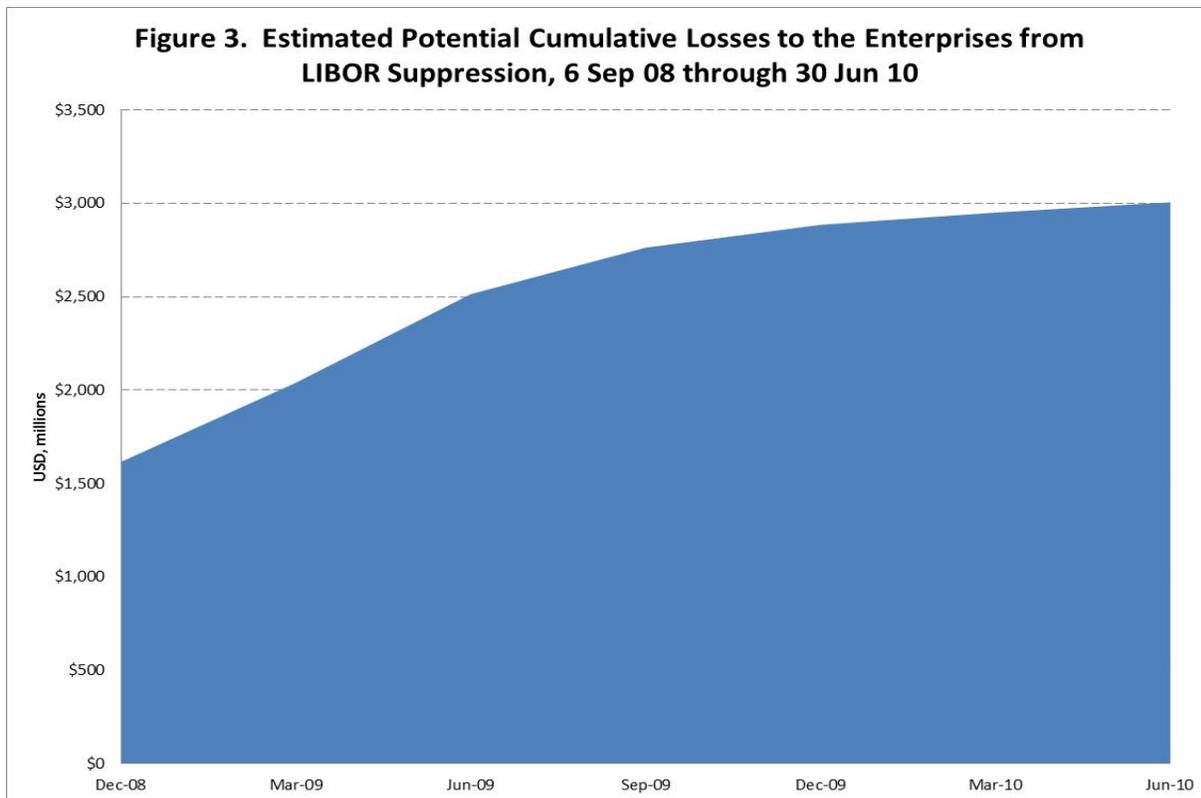
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

### Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### LIBOR Benchmarks

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

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- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, “[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)”, July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, “[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#),” March 2012, p.2

<sup>21</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, “[Mortgage-Backed Securities](#).” League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>22</sup> See, for example, Federal Housing Finance Agency, “[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#).”

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, “[New York Lender Files LIBOR Lawsuit](#)”, July 30, 2012, and Thomson Reuters, “[In re LIBOR-Based Financial Instruments Antitrust Litigation](#),” April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, “[State Regulators Widen LIBOR Investigation](#),” August 15, 2012, and BusinessWeek, “[US LIBOR Probers Said to Seek London Trader Interviews](#),” September 27, 2012.

## **FW: LIBOR memo**

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**Item ID:** 32177  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Emerzian, Peter </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e5f50330ff35406f9fb12c708e959aeb-Peter Emerz>  
**Subject:** FW: LIBOR memo  
**Sent:** November 1, 2012 9:52 AM  
**Received:** November 1, 2012 9:52 AM

Hi Peter, As requested. Emilia asked for it this morning. We sketched out our approach on the phone with SEC's accountants yesterday and got a reassuring response. However, to the best of my knowledge, right now the document is not yet authorized for release outside OIG. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR memo package proposed final.pdf**

**Original view**

14 pages (displayed on pages 3 to 16)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** November 1, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to alleged manipulation of the London Interbank Offered Rate (LIBOR) by a number of major financial institutions. As you know, on June 27, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation at other institutions are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11 they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. My staff has tentatively estimated that the Enterprises may have suffered \$3 billion in such losses. Those losses, of course, would have been funded by the Department of the Treasury under the Senior Preferred Stock Purchase Agreements in place with each Enterprise. I therefore believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of my staff in this regard.



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis, Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, [“The LIBOR Mess: How Did It Happen – And What Lies Ahead?”](#) July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### Analysis

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

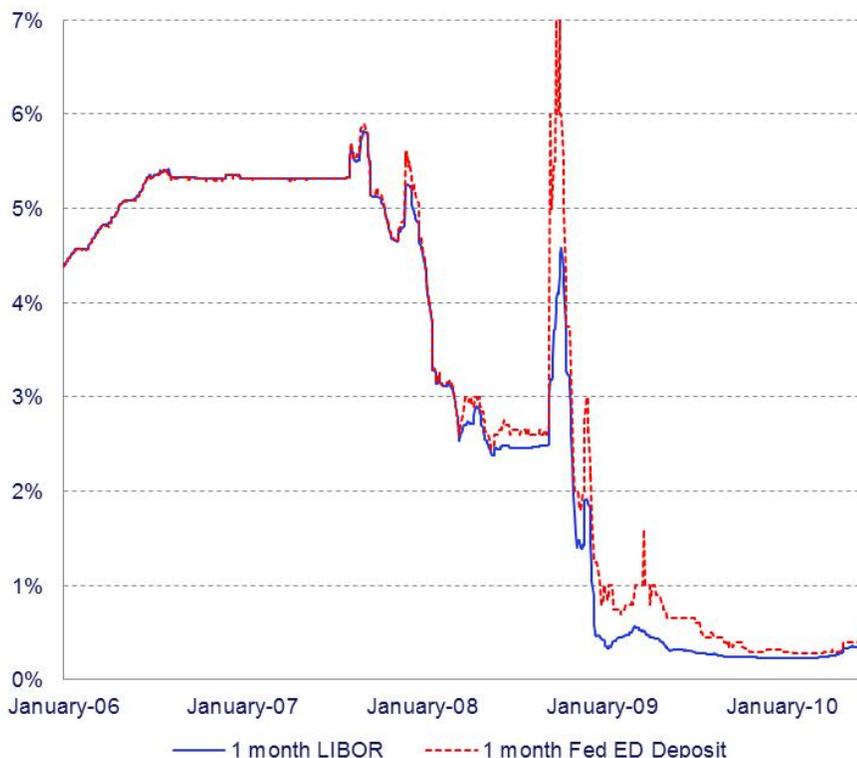
As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1

illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

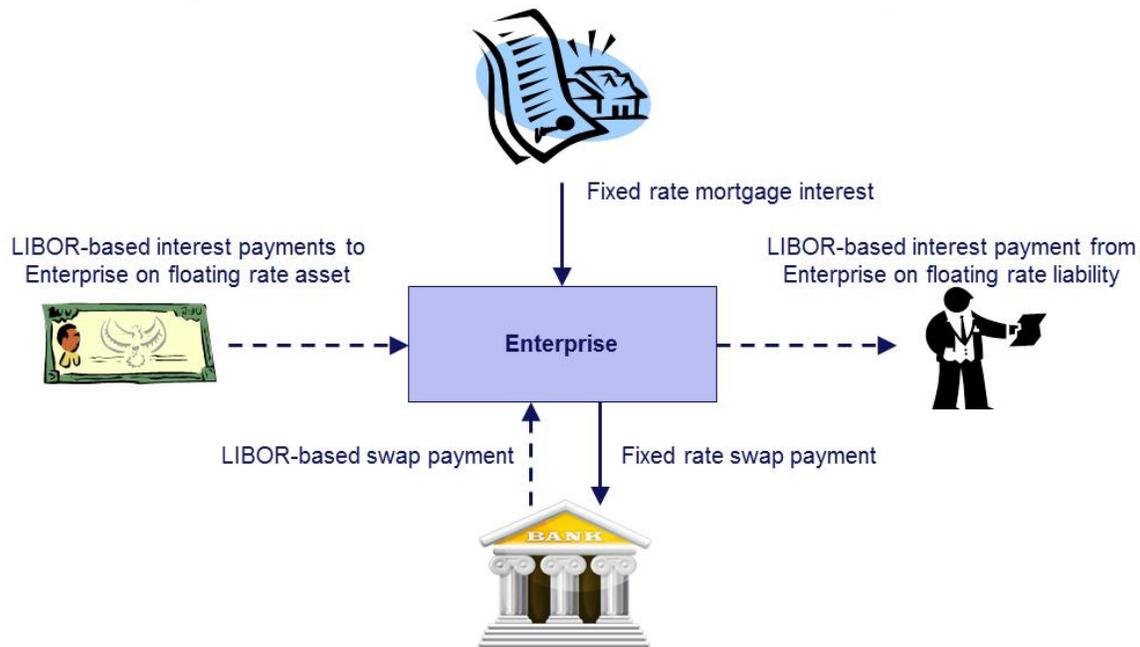
**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 2. LIBOR-Based Payments to and From the Enterprises**



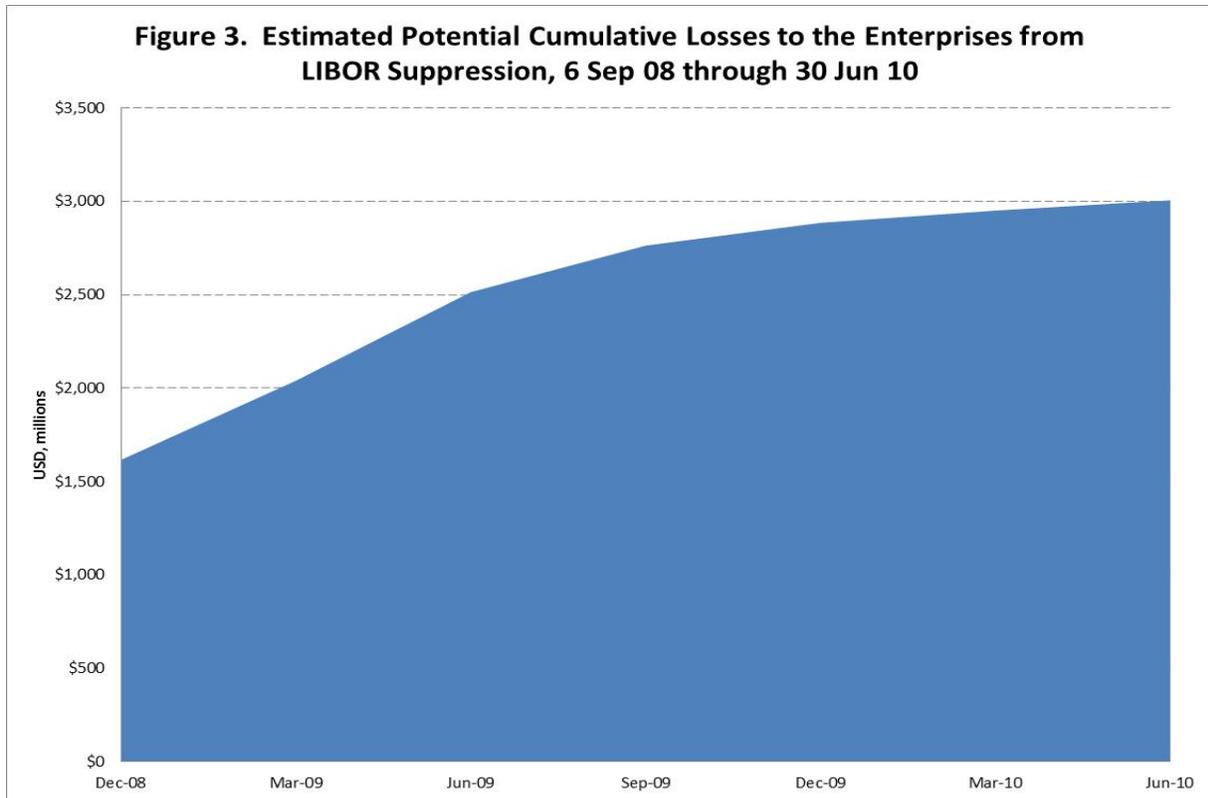
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

## Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

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- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, “[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)”, July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, “[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#),” March 2012, p.2

<sup>21</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, “[Mortgage-Backed Securities](#).” League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>22</sup> See, for example, Federal Housing Finance Agency, “[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#).”

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, “[New York Lender Files LIBOR Lawsuit](#)”, July 30, 2012, and Thomson Reuters, “[In re LIBOR-Based Financial Instruments Antitrust Litigation](#),” April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, “[State Regulators Widen LIBOR Investigation](#),” August 15, 2012, and BusinessWeek, “[US LIBOR Probers Said to Seek London Trader Interviews](#),” September 27, 2012.

## **FW: LIBOR memo**

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**Item ID:** 32178  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Linick, Steve </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=28c2cf7b529749f09f7ceff9f71a1cd9-Steve Linic>  
**Cc:** Stephens, Michael </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2da0367840de4f2c8c5ac168562ab556-Michael Ste>, Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, DiSanto, Emilia </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d94639648c304c1d8447667da03493cb-Emilia DiSa>  
**Subject:** FW: LIBOR memo  
**Sent:** November 1, 2012 10:25 AM  
**Received:** November 1, 2012 10:25 AM

Hi Steve, To follow up on the requested black-and-white hard copies, attached is the LIBOR document package in PDF format. Let me know if you need anything else. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR memo package proposed final.pdf**

**Original view**

14 pages (displayed on pages 3 to 16)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** November 1, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to alleged manipulation of the London Interbank Offered Rate (LIBOR) by a number of major financial institutions. As you know, on June 27, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation at other institutions are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11 they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. My staff has tentatively estimated that the Enterprises may have suffered \$3 billion in such losses. Those losses, of course, would have been funded by the Department of the Treasury under the Senior Preferred Stock Purchase Agreements in place with each Enterprise. I therefore believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of my staff in this regard.



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis, Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, [“The LIBOR Mess: How Did It Happen – And What Lies Ahead?”](#) July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### Analysis

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

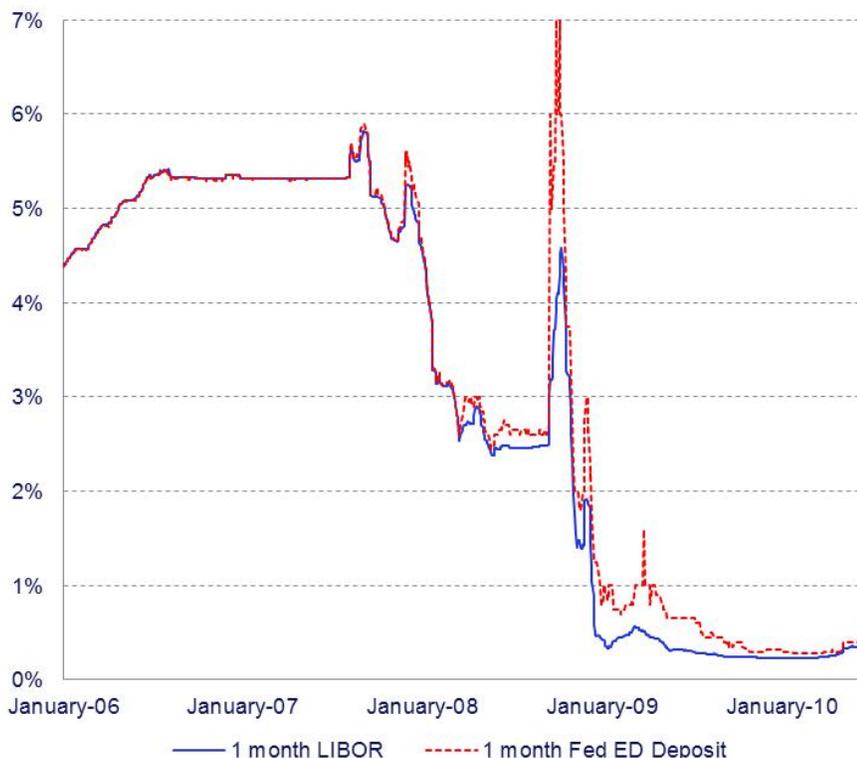
As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1

illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

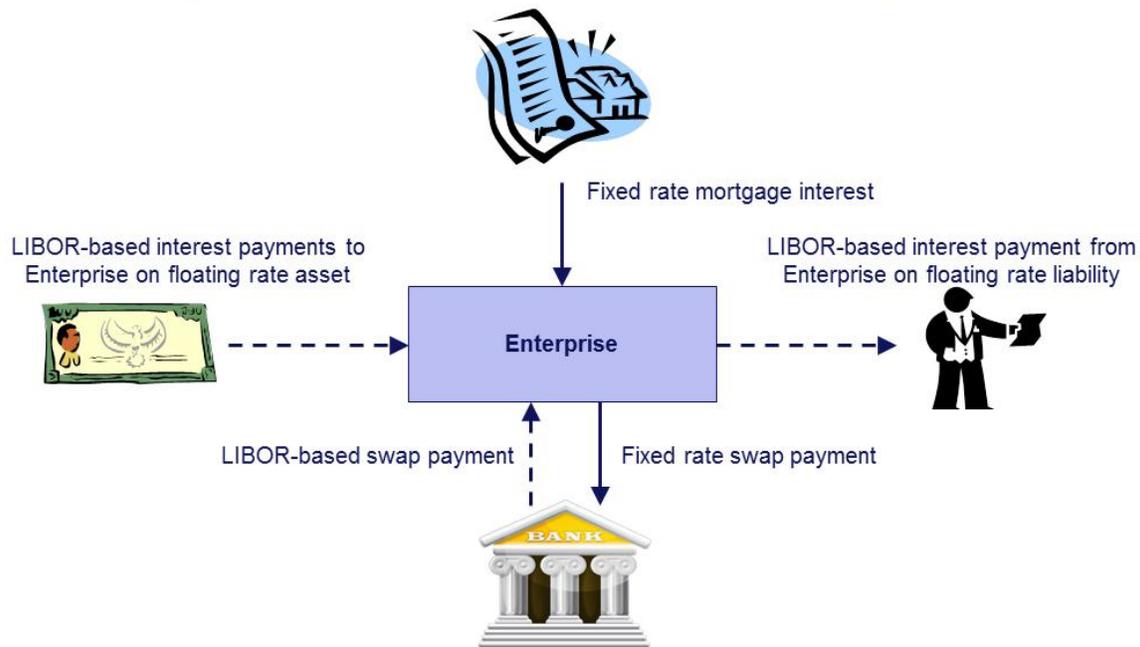
**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 2. LIBOR-Based Payments to and From the Enterprises**



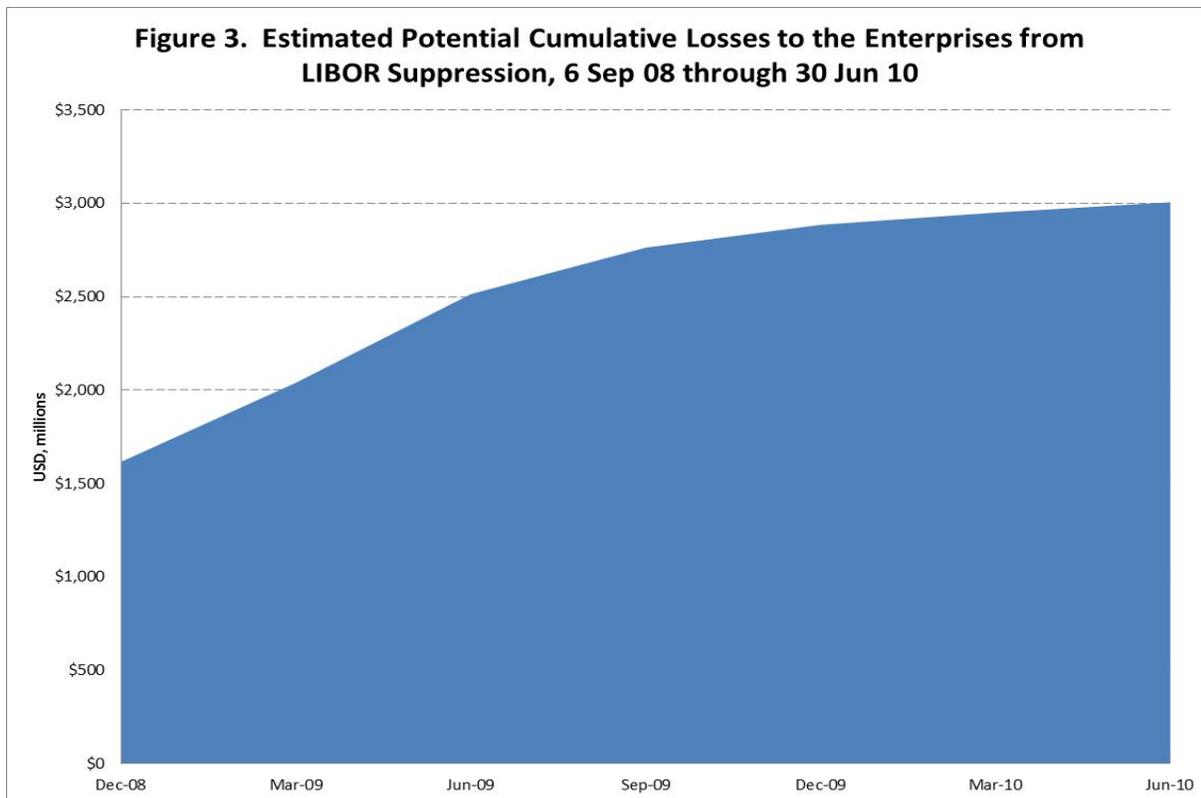
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

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In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

### Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.

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Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

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- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, “[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)”, July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, “[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#),” March 2012, p.2

<sup>21</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, “[Mortgage-Backed Securities](#).” League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>22</sup> See, for example, Federal Housing Finance Agency, “[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#).”

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, “[New York Lender Files LIBOR Lawsuit](#)”, July 30, 2012, and Thomson Reuters, “[In re LIBOR-Based Financial Instruments Antitrust Litigation](#),” April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, “[State Regulators Widen LIBOR Investigation](#),” August 15, 2012, and BusinessWeek, “[US LIBOR Probers Said to Seek London Trader Interviews](#),” September 27, 2012.

## RE: LIBOR memo

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**Item ID:** 32179  
**From:** Emerzian, Peter (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** (b) (6) (b) (6) Conlon, Paul  
(b) (6), Febles, Rene (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** November 1, 2012 10:33 AM  
**Received:** November 1, 2012 10:33 AM

Thanks From: Lee, Timothy Sent: Thursday, November 01, 2012 9:52 AM To: Emerzian, Peter Subject: FW: LIBOR memo Hi Peter, As requested. Emilia asked for it this morning. We sketched out our approach on the phone with SEC's accountants yesterday and got a reassuring response. However, to the best of my knowledge, right now the document is not yet authorized for release outside OIG. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

Attachment #1  
image001.png  
Image



**Peter C. Emerzian**

Deputy Inspector General for Investigations  
Office of Inspector General  
Federal Housing Finance Agency  
400 7th Street, SW  
Washington, DC 20024  
Office: (b) (6)  
Mobile: (b) (6)

## RE: LIBOR memo

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**Item ID:** 32180  
**From:** Linick, Steve (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Stephens, Michael (b) (6), Parker, Richard  
(b) (6), DiSanto, Emilia (b) (6)  
**Subject:** RE: LIBOR memo  
**Sent:** November 1, 2012 10:34 AM  
**Received:** November 1, 2012 10:34 AM

Please send word version. tx From: Lee, Timothy Sent: Thursday, November 01, 2012 10:25 AM To: Linick, Steve Cc: Stephens, Michael; Parker, Richard; DiSanto, Emilia Subject: FW: LIBOR memo Hi Steve, To follow up on the requested black-and-white hard copies, attached is the LIBOR document package in PDF format. Let me know if you need anything else. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## RE: LIBOR memo

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**Item ID:** 32181  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Linick, Steve </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=28c2cf7b529749f09f7ceff9f71a1cd9-Steve Linic>  
**Cc:** Stephens, Michael </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2da0367840de4f2c8c5ac168562ab556-Michael Ste>, Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, DiSanto, Emilia </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d94639648c304c1d8447667da03493cb-Emilia DiSa>  
**Subject:** RE: LIBOR memo  
**Sent:** November 1, 2012 10:45 AM  
**Received:** November 1, 2012 10:45 AM

From: Linick, Steve Sent: Thursday, November 01, 2012 10:35 AM To: Lee, Timothy Cc: Stephens, Michael; Parker, Richard; DiSanto, Emilia Subject: RE: LIBOR memo Please send word version. tx From: Lee, Timothy Sent: Thursday, November 01, 2012 10:25 AM To: Linick, Steve Cc: Stephens, Michael; Parker, Richard; DiSanto, Emilia Subject: FW: LIBOR memo Hi Steve, To follow up on the requested black-and-white hard copies, attached is the LIBOR document package in PDF format. Let me know if you need anything else. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR memo package proposed final.docx**

**Original view**

14 pages (displayed on pages 3 to 16)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** November 1, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to alleged manipulation of the London Interbank Offered Rate (LIBOR) by a number of major financial institutions. As you know, on June 27, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation at other institutions are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11 they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. My staff has tentatively estimated that the Enterprises may have suffered \$3 billion in such losses. Those losses, of course, would have been funded by the Department of the Treasury under the Senior Preferred Stock Purchase Agreements in place with each Enterprise. I therefore believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of my staff in this regard.



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis, Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, “[The LIBOR Mess: How Did It Happen – And What Lies Ahead?](#)” July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### Analysis

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

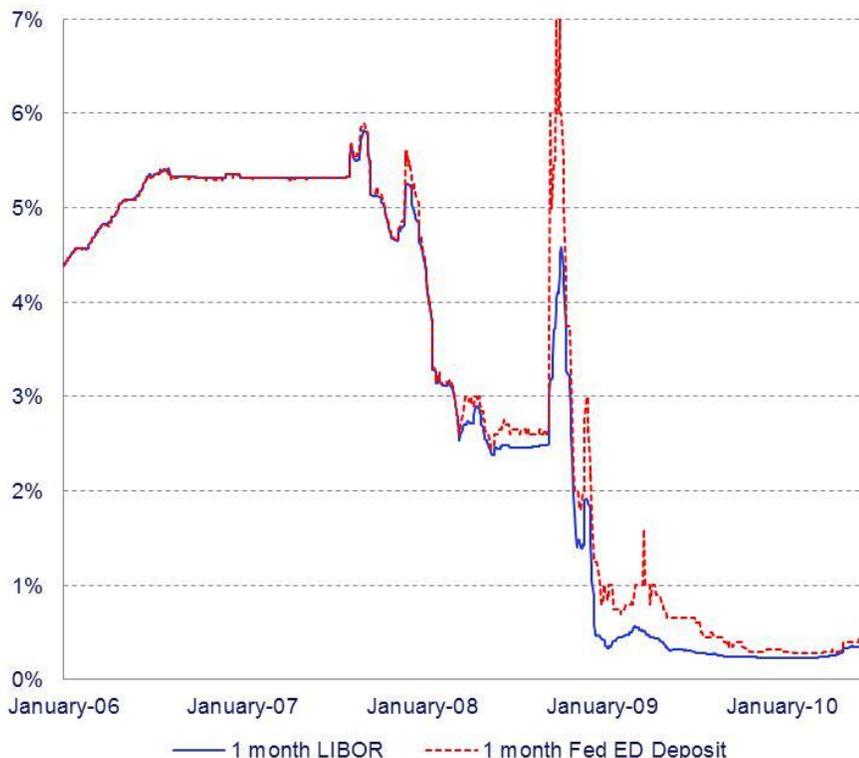
investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

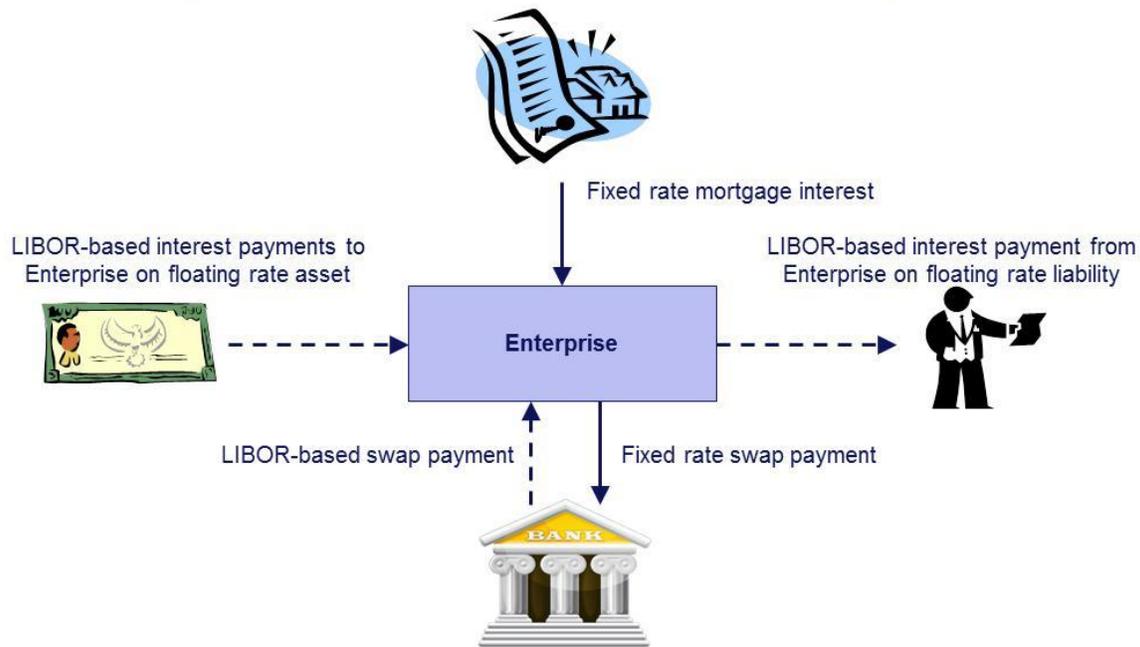
**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 2. LIBOR-Based Payments to and From the Enterprises**



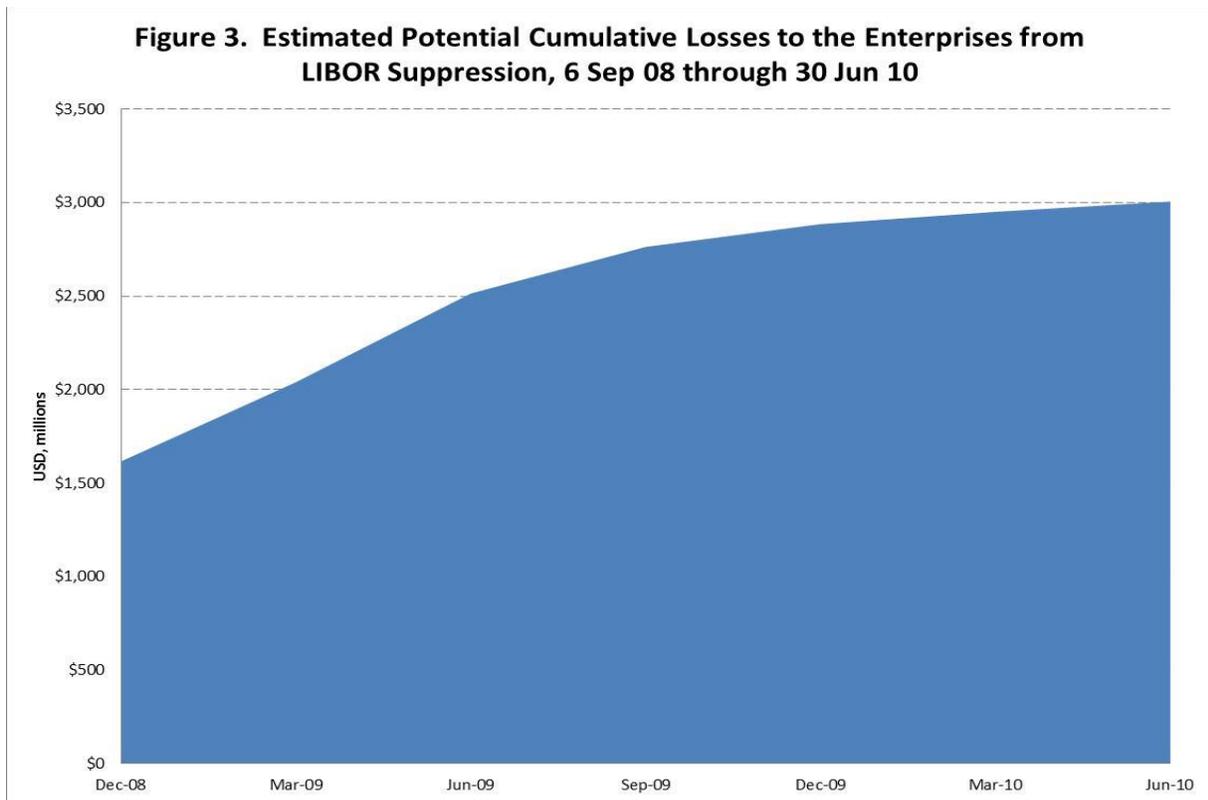
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

### Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

- 
- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained.](#)"
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, “[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)”, July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, “[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#),” March 2012, p.2

<sup>21</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, “[Mortgage-Backed Securities](#).” League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>22</sup> See, for example, Federal Housing Finance Agency, “[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#).”

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, “[New York Lender Files LIBOR Lawsuit](#)”, July 30, 2012, and Thomson Reuters, “[In re LIBOR-Based Financial Instruments Antitrust Litigation](#),” April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, “[State Regulators Widen LIBOR Investigation](#),” August 15, 2012, and BusinessWeek, “[US LIBOR Probers Said to Seek London Trader Interviews](#),” September 27, 2012.

## The latest and greatest

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**Item ID:** 32183  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Bloch, David </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fad4faf3677f4ce297d7bfaaed3a13ef-David Bloch>  
**Subject:** The latest and greatest  
**Sent:** November 1, 2012 10:46 AM  
**Received:** November 1, 2012 10:46 AM

[https://sharepoint.fhfaig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20memo%20package%20proposed%20final.docx](https://sharepoint.fhfaig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20memo%20package%20proposed%20final.docx)

[https://sharepoint.fhfaig.gov/policy\\_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20memo%20package%20proposed%20final.pdf](https://sharepoint.fhfaig.gov/policy_oversight/LIBOR/08.%20Draft%20Reports/LIBOR%20memo%20package%20proposed%20final.pdf)

[https://sharepoint.fhfaig.gov/policy\\_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal%20final.xlsx](https://sharepoint.fhfaig.gov/policy_oversight/LIBOR/07.%20Research%20and%20Analysis/LIBOR%20proposal%20final.xlsx)

## RE: LIBOR memo

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**Item ID:** 32184  
**From:** Stephens, Michael (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>, Linick, Steve (b) (6)  
**Cc:** Parker, Richard (b) (6), DiSanto, Emilia  
(b) (6) >  
**Subject:** RE: LIBOR memo  
**Sent:** November 1, 2012 2:29 PM  
**Received:** November 1, 2012 2:29 PM

Steve. Remember to include a requirement for Ed to respond in 14 days. From: Lee, Timothy Sent: Thursday, November 01, 2012 10:45 AM To: Linick, Steve Cc: Stephens, Michael; Parker, Richard; DiSanto, Emilia Subject: RE: LIBOR memo From: Linick, Steve Sent: Thursday, November 01, 2012 10:35 AM To: Lee, Timothy Cc: Stephens, Michael; Parker, Richard; DiSanto, Emilia Subject: RE: LIBOR memo Please send word version. tx From: Lee, Timothy Sent: Thursday, November 01, 2012 10:25 AM To: Linick, Steve Cc: Stephens, Michael; Parker, Richard; DiSanto, Emilia Subject: FW: LIBOR memo Hi Steve, To follow up on the requested black-and-white hard copies, attached is the LIBOR document package in PDF format. Let me know if you need anything else. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **FW: LIBOR memo**

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**Item ID:** 32185  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Grob, George </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ff8932c3d3b45e5ba63ba69f8c08f80-George Grob>  
**Subject:** FW: LIBOR memo  
**Sent:** November 2, 2012 9:21 AM  
**Received:** November 2, 2012 9:21 AM

Hi George, WRT to claiming ROI – happy to talk when you free up Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 10:25 AM To: Linick, Steve Cc: Stephens, Michael; Parker, Richard; DiSanto, Emilia Subject: FW: LIBOR memo Hi Steve, To follow up on the requested black-and-white hard copies, attached is the LIBOR document package in PDF format. Let me know if you need anything else. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**Attachment #1**

**LIBOR memo package proposed final.pdf**

**Original view**

14 pages (displayed on pages 3 to 16)



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Edward J. DeMarco, Acting Director  
**From:** Steve A. Linick, Inspector General  
**Subject:** Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
**Date:** November 1, 2012

Please find attached a staff memorandum that details my concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to alleged manipulation of the London Interbank Offered Rate (LIBOR) by a number of major financial institutions. As you know, on June 27, the Department of Justice announced an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation at other institutions are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11 they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises. To date, however, FHFA-OIG remains unaware of any steps taken by the Agency or the Enterprises to investigate the matter further.

The memorandum outlines in detail my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. My staff has tentatively estimated that the Enterprises may have suffered \$3 billion in such losses. Those losses, of course, would have been funded by the Department of the Treasury under the Senior Preferred Stock Purchase Agreements in place with each Enterprise. I therefore believe that this matter warrants the Agency's attention. Please do not hesitate to contact me or any of my staff in this regard.



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis, Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, [“The LIBOR Mess: How Did It Happen – And What Lies Ahead?”](#) July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### Analysis

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

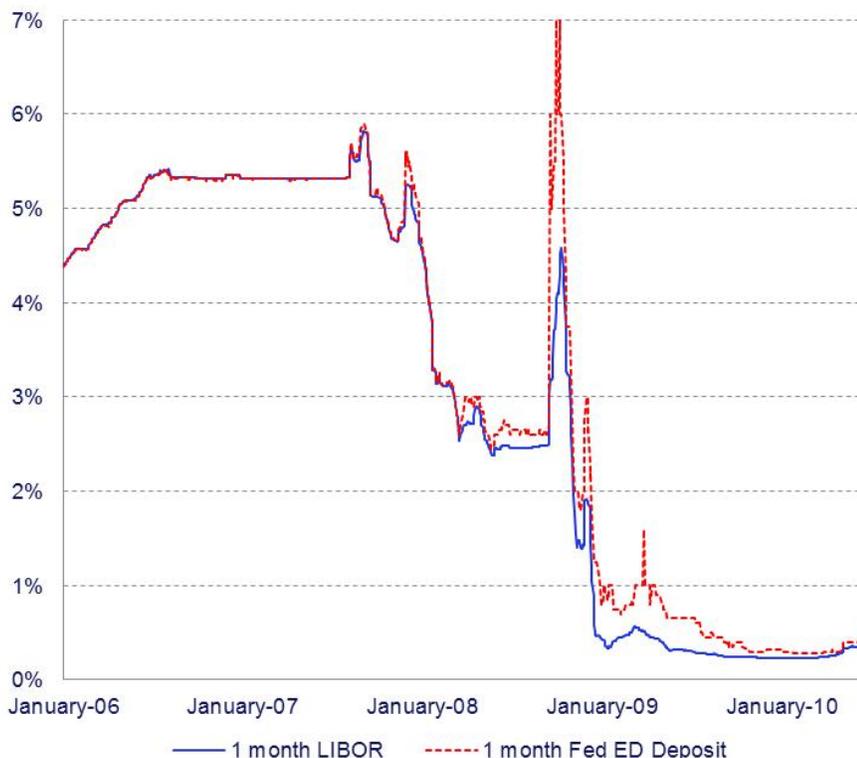
As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1

illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

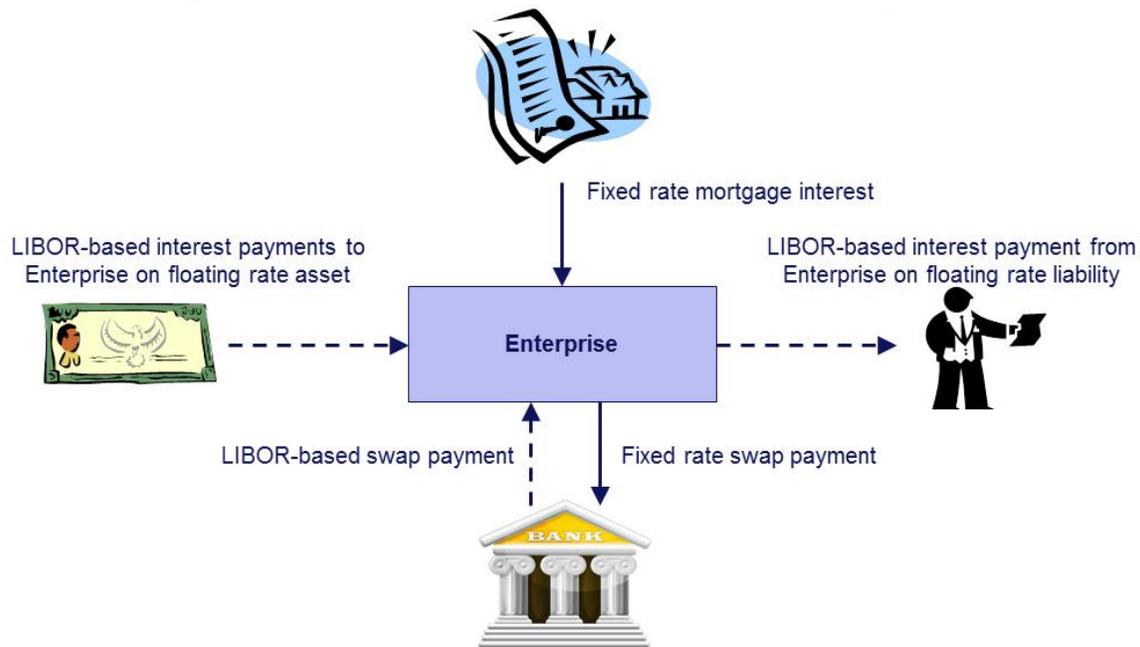
**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 2. LIBOR-Based Payments to and From the Enterprises**



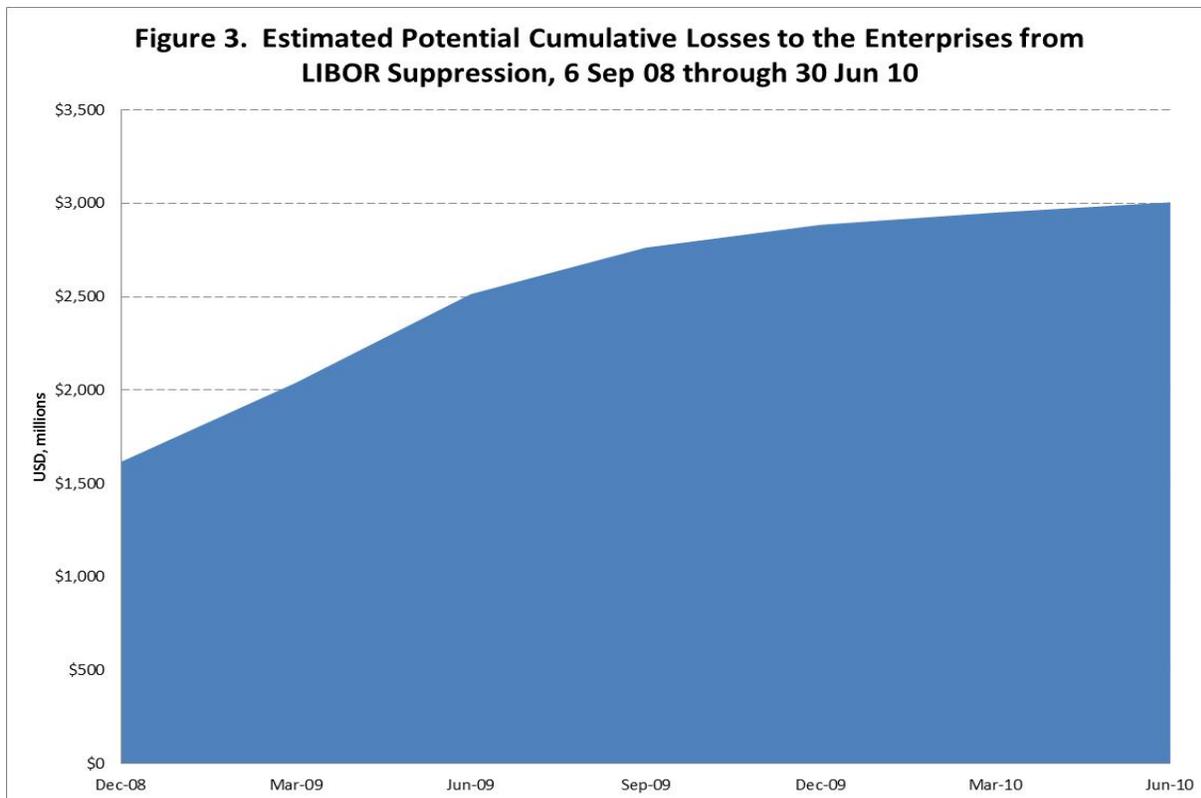
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007's ten leading underwriters of "private label" mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises' floating-rate

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

### Recommendations

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises' public 10-K and 10-Q filings.

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

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- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained.](#)"
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech.](#)" September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™.](#)" July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts.](#)"
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty.](#)" June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation.](#)" August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews.](#)" September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal.](#)" August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart.](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1.](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities.](#)"
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\).](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\).](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize.](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath.](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation.](#)" April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty.](#)" June 27, 2012.

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, “[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)”, July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, “[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#),” March 2012, p.2

<sup>21</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, “[Mortgage-Backed Securities](#).” League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>22</sup> See, for example, Federal Housing Finance Agency, “[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#).”

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, “[New York Lender Files LIBOR Lawsuit](#)”, July 30, 2012, and Thomson Reuters, “[In re LIBOR-Based Financial Instruments Antitrust Litigation](#),” April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, “[State Regulators Widen LIBOR Investigation](#),” August 15, 2012, and BusinessWeek, “[US LIBOR Probers Said to Seek London Trader Interviews](#),” September 27, 2012.

## LIBOR...more news

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**Item ID:** 32186  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** LIBOR...more news  
**Sent:** November 2, 2012 11:00 AM  
**Received:** November 2, 2012 11:00 AM

Looks like RBS is facing a settlement...we'll see if it includes admissions the way Barclays did.

<http://www.reuters.com/article/2012/11/02/rbs-earnings-idUSL5E8M21JS20121102> ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

# LIBOR

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**Item ID:** 32187  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** LIBOR  
**Sent:** November 5, 2012 10:38 AM  
**Received:** November 5, 2012 10:38 AM

Hi Old Salt, Any reaction that we know of on DeMarco's part to the memo? Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **FW: Message from Shared-Printer-1**

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**Item ID:** 32192  
**From:** Linick, Steve (b) (6)  
**To:** Bloch, David (b) (6); Wu, Simon (b) (6), Lee, Timothy <Timothy.Lee@fhfaioig.gov>  
**Cc:** Grob, George (b) (6); Frost, David (b) (6), Parker, Richard (b) (6); Stephens, Michael (b) (6); DiSanto, Emilia (b) (6)  
**Subject:** FW: Message from Shared-Printer-1  
**Sent:** November 5, 2012 5:24 PM  
**Received:** November 5, 2012 5:24 PM

Folks Very nice job on this memo. I forwarded to the Director and asked for written comments by Nov. 16. Please do not disseminate the memo to anyone outside the agency until further notice from me. tx From: Linick, Steve Sent: Friday, November 02, 2012 5:50 PM To: 'DeMarco, Edward' Subject: FW: Message from Shared-Printer-1 Hi Ed As promised, I am forwarding the memo report that my team produced regarding LIBOR. As indicated in my cover memo, we are treating this like any other report insofar as we are requesting written comments from the Agency regarding our recommendations to study the issue. Let me know if you have any questions or concerns. Have a great weekend. Steve From (b) (6) Sent: Friday, November 02, 2012 3:19 PM To: Linick, Steve Subject: Message from Shared-Printer-1 (b) (6) Federal Housing Finance Agency Office of Inspector General (b) (6) office (b) (6) cell (b) (6) main line

**Attachment #1**

**Memo 11022012.pdf**

**Original view**

14 pages (displayed on pages 3 to 16)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

To: Edward J. DeMarco, Acting Director  
From: Steve A. Linick, Inspector General   
Subject: Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
Date: November 2, 2012

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Please find attached a staff memorandum report detailing concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to manipulation of the London Interbank Offered Rate (LIBOR). As you know, the Department of Justice announced on June 27, 2012, an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11, they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises.

The enclosed memorandum report outlines my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. In light of the fact that my staff has preliminarily estimated that the Enterprises may have suffered more than \$3 billion in such losses, I believe this matter warrants the Agency's attention. I would appreciate if the Agency could provide written comments to OIG's recommendations by November 16, 2012. Please do not hesitate to contact me if you have any questions about this matter.



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, [“The LIBOR Mess: How Did It Happen – And What Lies Ahead?”](#) July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### **Analysis**

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

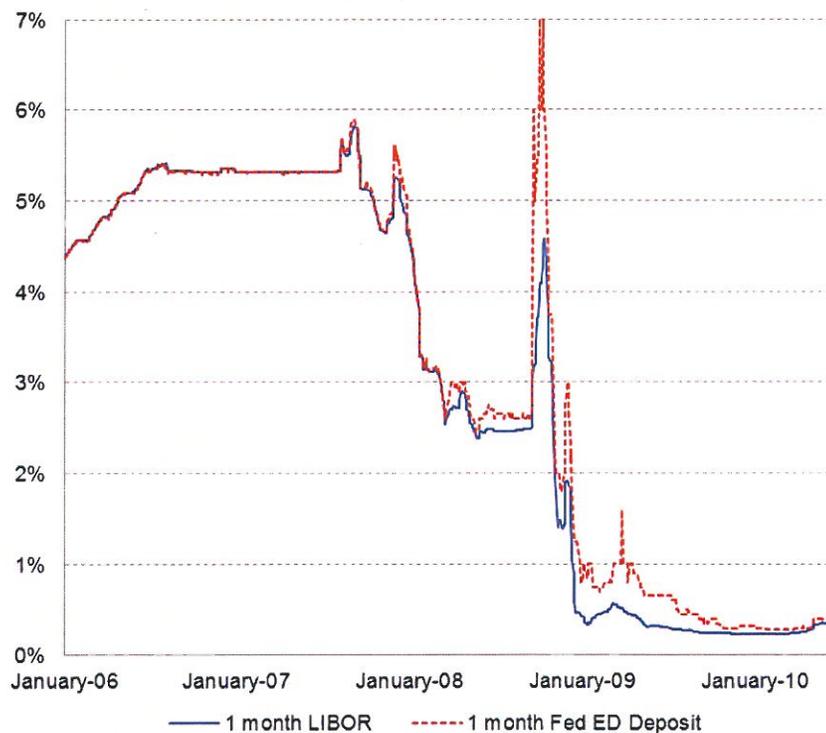
previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

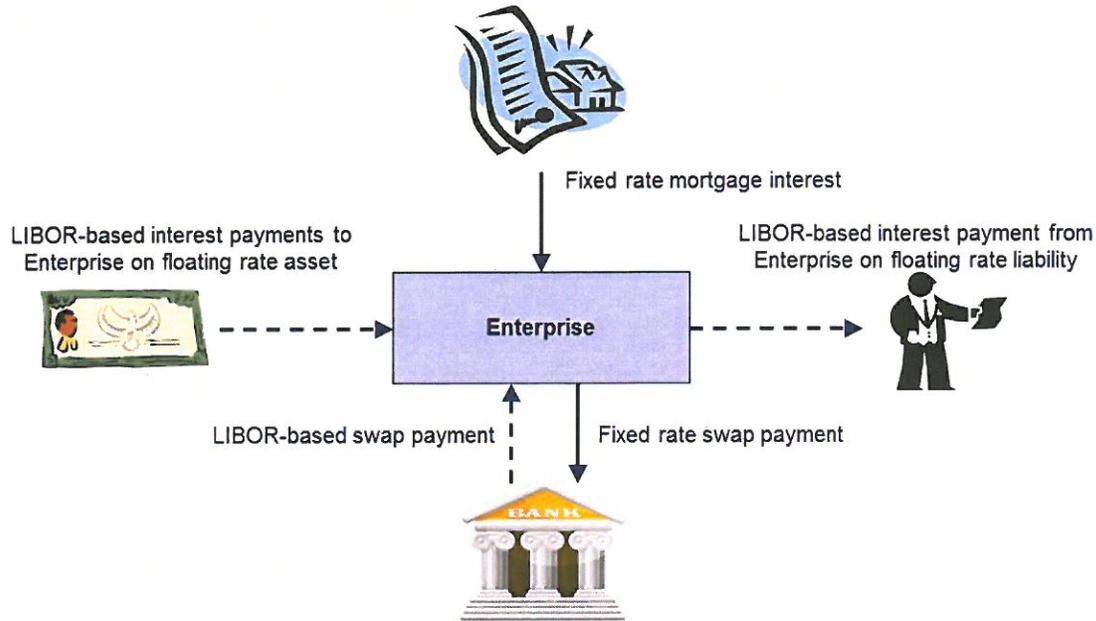
... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



**Figure 2. LIBOR-Based Payments to and From the Enterprises**



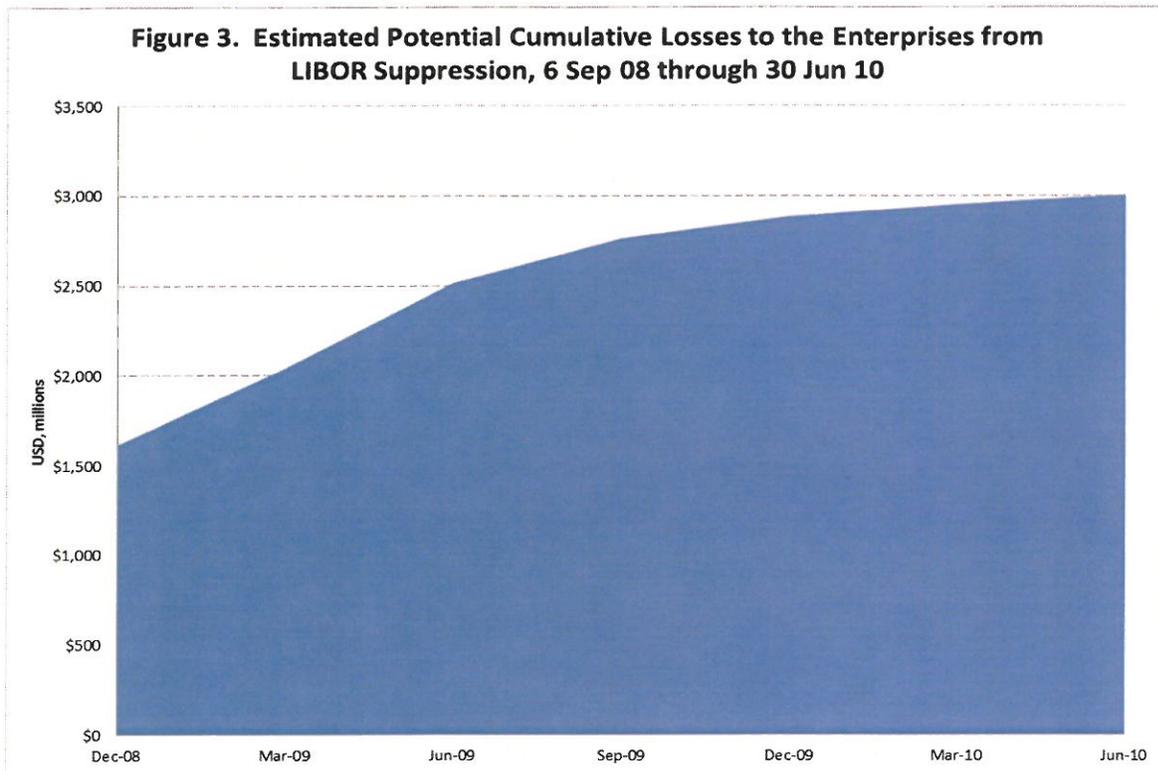
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises' conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises' interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007’s ten leading underwriters of “private label” mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup> However, our review of a small sample of offering documents for the Enterprises’ floating-rate

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

**Recommendations**

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises’ public 10-K and 10-Q filings.

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

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- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012, p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.

## **RE: Message from Shared-Printer-1**

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**Item ID:** 32189  
**From:** Grob, George (b) (6)  
**To:** Parker, Richard (b) (6), Bloch, David (b) (6),  
Lee, Timothy <Timothy.Lee@fhfa.gov>, Wu, Simon (b) (6)  
**Cc:** Linick, Steve (b) (6), Frost, David (b) (6),  
Stephens, Michael (b) (6), DiSanto, Emilia  
(b) (6)  
**Subject:** RE: Message from Shared-Printer-1  
**Sent:** November 5, 2012 5:33 PM  
**Received:** November 5, 2012 5:33 PM

Richard, David, Tim, Simone, Nice work all—a real pleasure working with you on this. George From: Linick, Steve Sent: Monday, November 05, 2012 5:24 PM To: Bloch, David; Wu, Simon; Lee, Timothy Cc: Grob, George; Frost, David; Parker, Richard; Stephens, Michael; DiSanto, Emilia Subject: FW: Message from Shared-Printer-1 Folks Very nice job on this memo. I forwarded to the Director and asked for written comments by Nov. 16. Please do not disseminate the memo to anyone outside the agency until further notice from me. tx From: Linick, Steve Sent: Friday, November 02, 2012 5:50 PM To: 'DeMarco, Edward' Subject: FW: Message from Shared-Printer-1 Hi Ed As promised, I am forwarding the memo report that my team produced regarding LIBOR. As indicated in my cover memo, we are treating this like any other report insofar as we are requesting written comments from the Agency regarding our recommendations to study the issue. Let me know if you have any questions or concerns. Have a great weekend. Steve From: (b) (6) Sent: Friday, November 02, 2012 3:19 PM To: Linick, Steve Subject: Message from Shared-Printer-1 (b) (6) Federal Housing Finance Agency Office of Inspector General (b) (6) office (b) (6) cell (b) (6) main line

## **RE: Message from Shared-Printer-1**

---

**Item ID:** 32188  
**From:** Parker, Richard (b) (6)  
**To:** Grob, George (b) (6), Bloch, David (b) (6), Lee, Timothy <Timothy.Lee@fhfa.ig.gov>, Wu, Simon (b) (6)  
**Cc:** Linick, Steve (b) (6), Frost, David (b) (6), Stephens, Michael (b) (6), DiSanto, Emilia (b) (6)  
**Subject:** RE: Message from Shared-Printer-1  
**Sent:** November 5, 2012 5:34 PM  
**Received:** November 5, 2012 5:34 PM

Same here. The first of many good things to come, I'm sure. From: Grob, George Sent: Monday, November 05, 2012 5:33 PM To: Parker, Richard; Bloch, David; Lee, Timothy; Wu, Simon Cc: Linick, Steve; Frost, David; Stephens, Michael; DiSanto, Emilia Subject: RE: Message from Shared-Printer-1 Richard, David, Tim, Simone, Nice work all—a real pleasure working with you on this. George From: Linick, Steve Sent: Monday, November 05, 2012 5:24 PM To: Bloch, David; Wu, Simon; Lee, Timothy Cc: Grob, George; Frost, David; Parker, Richard; Stephens, Michael; DiSanto, Emilia Subject: FW: Message from Shared-Printer-1 Folks Very nice job on this memo. I forwarded to the Director and asked for written comments by Nov. 16. Please do not disseminate the memo to anyone outside the agency until further notice from me. tx From: Linick, Steve Sent: Friday, November 02, 2012 5:50 PM To: 'DeMarco, Edward' Subject: FW: Message from Shared-Printer-1 Hi Ed As promised, I am forwarding the memo report that my team produced regarding LIBOR. As indicated in my cover memo, we are treating this like any other report insofar as we are requesting written comments from the Agency regarding our recommendations to study the issue. Let me know if you have any questions or concerns. Have a great weekend. Steve From: (b) (6) Sent: Friday, November 02, 2012 3:19 PM To: Linick, Steve Subject: Message from Shared-Printer-1 (b) (6) Federal Housing Finance Agency Office of Inspector General (b) (6) office (b) (6) cell (b) (6) main line

## RE: LIBOR memo

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**Item ID:** 32193  
**From:** Emerzian, Peter (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: LIBOR memo  
**Sent:** November 6, 2012 10:20 AM  
**Received:** November 6, 2012 10:20 AM

Did this go out? Can a I get a signed copy if it did? From: Lee, Timothy Sent: Thursday, November 01, 2012 9:52 AM  
To: Emerzian, Peter Subject: FW: LIBOR memo Hi Peter, As requested. Emilia asked for it this morning. We sketched out our approach on the phone with SEC's accountants yesterday and got a reassuring response. However, to the best of my knowledge, right now the document is not yet authorized for release outside OIG. Tim From: Lee, Timothy Sent: Thursday, November 01, 2012 9:37 AM To: DiSanto, Emilia Cc: Parker, Richard; (b) (6) Subject: LIBOR memo Hi Em, Attached is the LIBOR memo package. The Word file and a verified Excel spreadsheet are also on SharePoint. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

Attachment #1  
image001.png  
Image



**Peter C. Emerzian**

Deputy Inspector General for Investigations  
Office of Inspector General  
Federal Housing Finance Agency  
400 7th Street, SW  
Washington, DC 20024  
Office: (b) (6)  
Mobile: (b) (6)

## **FW: Message from Shared-Printer-1**

---

**Item ID:** 32194  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Emerzian, Peter </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e5f50330ff35406f9fb12c708e959aeb-Peter Emerz>  
**Subject:** FW: Message from Shared-Printer-1  
**Sent:** November 6, 2012 10:25 AM  
**Received:** November 6, 2012 10:25 AM

From: Linick, Steve Sent: Monday, November 05, 2012 5:24 PM To: Bloch, David; Wu, Simon; Lee, Timothy Cc: Grob, George; Frost, David; Parker, Richard; Stephens, Michael; DiSanto, Emilia Subject: FW: Message from Shared-Printer-1 Folks Very nice job on this memo. I forwarded to the Director and asked for written comments by Nov. 16. Please do not disseminate the memo to anyone outside the agency until further notice from me. tx From: Linick, Steve Sent: Friday, November 02, 2012 5:50 PM To: 'DeMarco, Edward' Subject: FW: Message from Shared-Printer-1 Hi Ed As promised, I am forwarding the memo report that my team produced regarding LIBOR. As indicated in my cover memo, we are treating this like any other report insofar as we are requesting written comments from the Agency regarding our recommendations to study the issue. Let me know if you have any questions or concerns. Have a great weekend. Steve From: (b) (6) Sent: Friday, November 02, 2012 3:19 PM To: Linick, Steve Subject: Message from Shared-Printer-1 (b) (6) Federal Housing Finance Agency Office of Inspector General (b) (6) office (b) (6) cell (b) (6) main line

**Attachment #1**

**Memo 11022012.pdf**

**Original view**

14 pages (displayed on pages 3 to 16)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

To: Edward J. DeMarco, Acting Director  
From: Steve A. Linick, Inspector General   
Subject: Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
Date: November 2, 2012

---

Please find attached a staff memorandum report detailing concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to manipulation of the London Interbank Offered Rate (LIBOR). As you know, the Department of Justice announced on June 27, 2012, an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11, they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises.

The enclosed memorandum report outlines my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. In light of the fact that my staff has preliminarily estimated that the Enterprises may have suffered more than \$3 billion in such losses, I believe this matter warrants the Agency's attention. I would appreciate if the Agency could provide written comments to OIG's recommendations by November 16, 2012. Please do not hesitate to contact me if you have any questions about this matter.



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, [“The LIBOR Mess: How Did It Happen – And What Lies Ahead?”](#) July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### **Analysis**

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

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<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

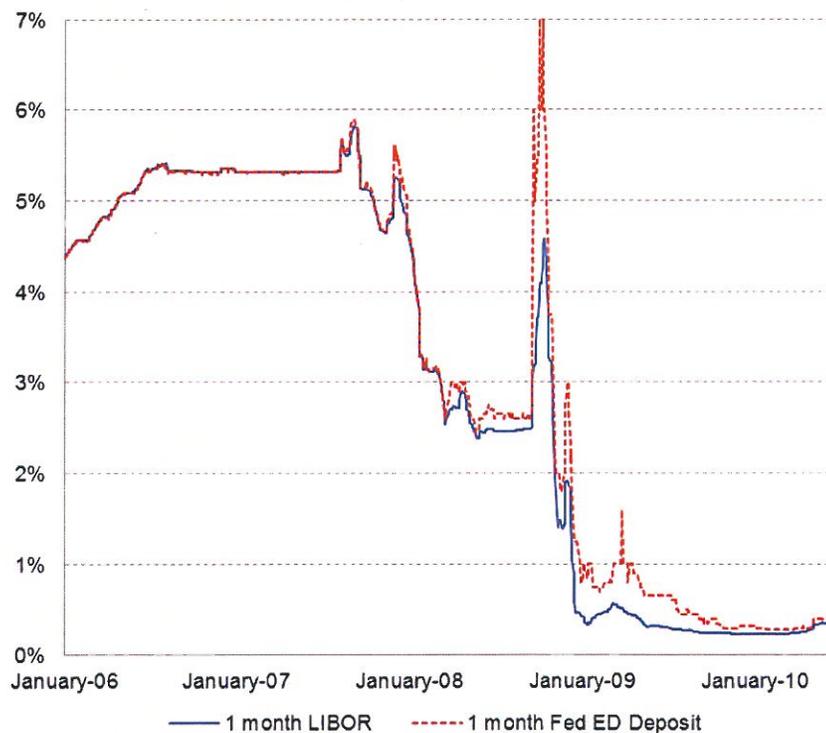
previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

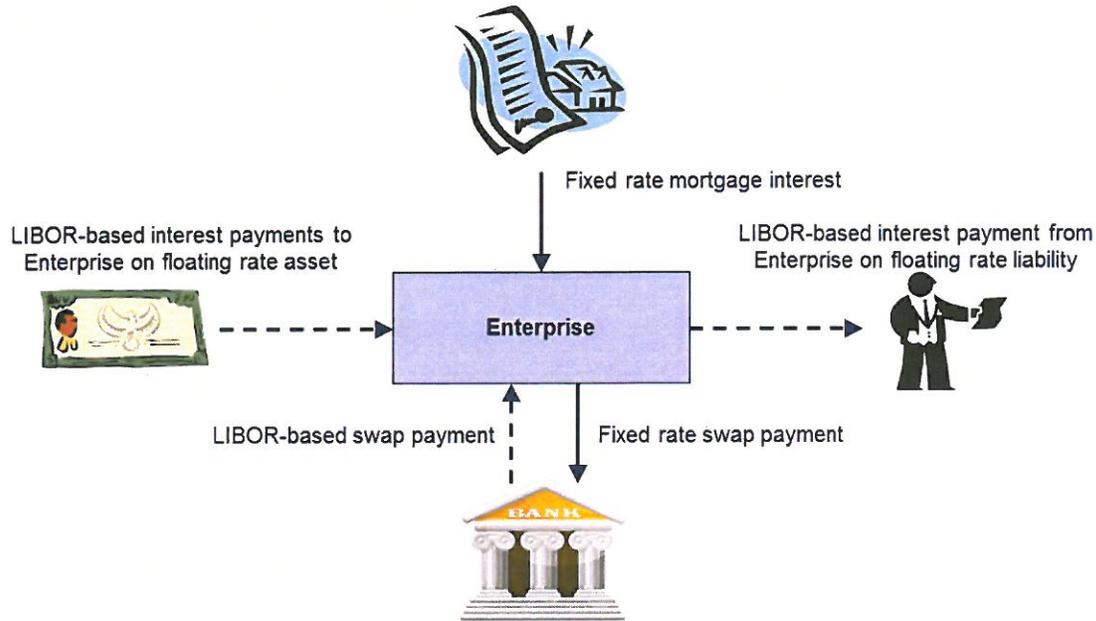
... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



**Figure 2. LIBOR-Based Payments to and From the Enterprises**



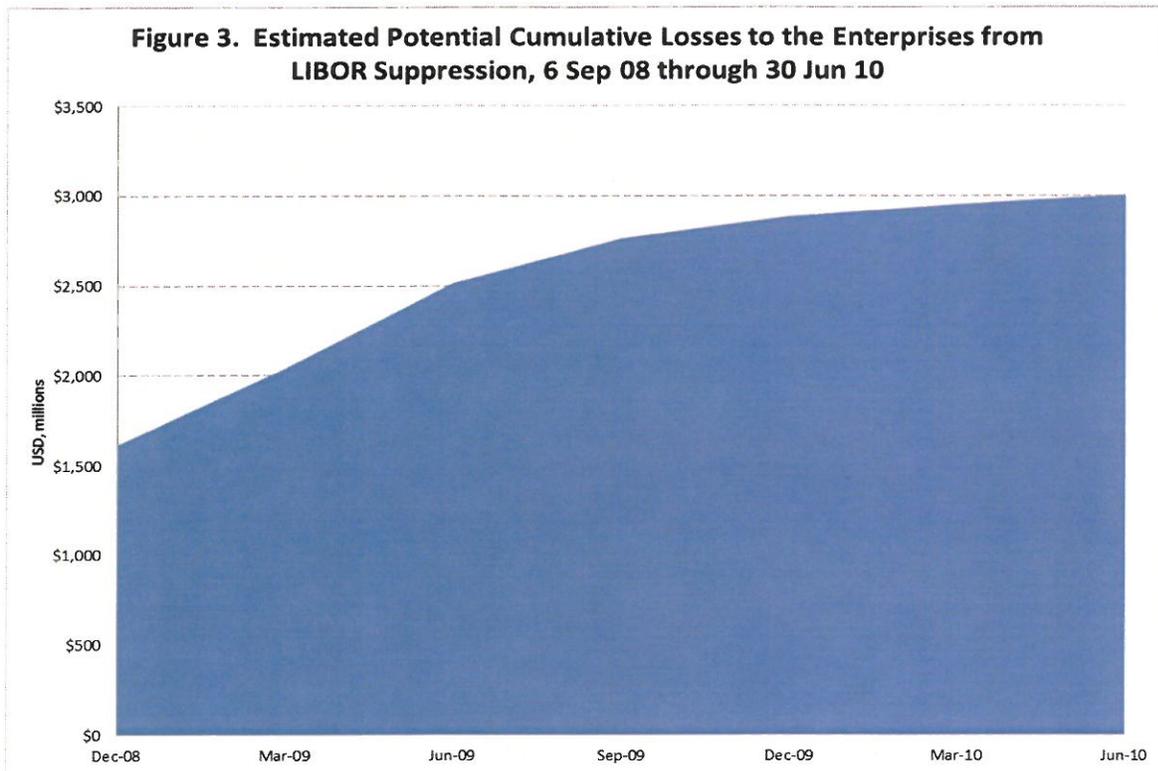
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises' conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises' interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007’s ten leading underwriters of “private label” mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises’ floating-rate

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

**Recommendations**

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises’ public 10-K and 10-Q filings.

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

- 
- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

---

<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, [“Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge”](#), July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, [“An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting,”](#) March 2012, p.2

<sup>21</sup> “Private label” MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, [“Mortgage-Backed Securities,”](#) League table data provided by Inside Mortgage Finance, “Mortgage Market Statistical Annual.”

<sup>22</sup> See, for example, Federal Housing Finance Agency, [“FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac.”](#)

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, [“New York Lender Files LIBOR Lawsuit”](#), July 30, 2012, and Thomson Reuters, [“In re LIBOR-Based Financial Instruments Antitrust Litigation,”](#) April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, [“State Regulators Widen LIBOR Investigation,”](#) August 15, 2012, and BusinessWeek, [“US LIBOR Probers Said to Seek London Trader Interviews,”](#) September 27, 2012.

## **RE: Emailing: LIBOR proposal.xlsx**

---

**Item ID:** 32195  
**From:** (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Emailing: LIBOR proposal.xlsx  
**Sent:** November 9, 2012 9:49 AM  
**Received:** November 9, 2012 9:49 AM

We are still working on this issue over here -- I drafted an internal memo just this week. Figure that there's a football that has been punted and is now rolling toward the goal line. It's anybody's guess whether it will stop at the 1, or roll into the end zone.

-----Original Message-----

**From:** Lee, Timothy [mailto:Timothy.Lee@fhfaoig.gov]  
**Sent:** Monday, October 15, 2012 9:50 AM  
**To:** (b) (6)  
**Subject:** Emailing: LIBOR proposal.xlsx

Hi (b) (6),

Per our conversation. The chart is under "Cum Loss Estimate." Happy to walk you through the concepts behind the revision if you like.

Best,

Tim

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## **RE: Emailing: LIBOR proposal.xlsx**

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**Item ID:** 32196  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6)  
**Subject:** RE: Emailing: LIBOR proposal.xlsx  
**Sent:** November 9, 2012 2:50 PM  
**Received:** November 9, 2012 2:50 PM

We should catch up on the phone. Can I call you on Tuesday?

-----Original Message-----

**From:** (b) (6)  
**Sent:** Friday, November 09, 2012 9:50 AM  
**To:** Lee, Timothy  
**Subject:** RE: Emailing: LIBOR proposal.xlsx

We are still working on this issue over here -- I drafted an internal memo just this week. Figure that there's a football that has been punted and is now rolling toward the goal line. It's anybody's guess whether it will stop at the 1, or roll into the end zone.

-----Original Message-----

**From:** Lee, Timothy [mailto:Timothy.Lee@fhfaoig.gov]  
**Sent:** Monday, October 15, 2012 9:50 AM  
**To:** (b) (6)  
**Subject:** Emailing: LIBOR proposal.xlsx

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Best,  
Tim

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## **RE: Emailing: LIBOR proposal.xlsx**

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**Item ID:** 32197  
**From:** [REDACTED] (b) (6) >  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: Emailing: LIBOR proposal.xlsx  
**Sent:** November 9, 2012 2:55 PM  
**Received:** November 9, 2012 2:56 PM

sure

-----Original Message-----

**From:** Lee, Timothy [mailto:Timothy.Lee@fhfaoig.gov]  
**Sent:** Friday, November 09, 2012 2:51 PM  
**To:** [REDACTED] (b) (6)

**Subject:** RE: Emailing: LIBOR proposal.xlsx

We should catch up on the phone. Can I call you on Tuesday?

-----Original Message-----

**From:** [REDACTED] (b) (6)  
**Sent:** Friday, November 09, 2012 9:50 AM  
**To:** Lee, Timothy

**Subject:** RE: Emailing: LIBOR proposal.xlsx

We are still working on this issue over here -- I drafted an internal memo just this week. Figure that there's a football that has been punted and is now rolling toward the goal line. It's anybody's guess whether it will stop at the 1, or roll into the end zone.

-----Original Message-----

**From:** Lee, Timothy [mailto:Timothy.Lee@fhfaoig.gov]  
**Sent:** Monday, October 15, 2012 9:50 AM  
**To:** [REDACTED] (b) (6)

**Subject:** Emailing: LIBOR proposal.xlsx

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Per our conversation. The chart is under "Cum Loss Estimate." Happy to walk you through the concepts behind the revision if you like.

Best,

Tim

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**FWDiSanto, Emilia (b) (6) : Good article on  
British Investigation into RBS and UBS on Libor Probe**

---

**Item ID:** 32198  
**From:** (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Cc:** Parker, Richard (b) (6), DiSanto, Emilia  
(b) (6)  
**Subject:** FWDiSanto, Emilia (b) (6) : Good article on  
British Investigation into RBS and UBS on Libor Probe  
**Sent:** November 9, 2012 5:23 PM  
**Received:** November 9, 2012 5:23 PM

Hi Tim, Thought you might have an interest in this article that (b) (6) (OI) brought to my attention Hope you have a lovely weekend, (b) (6) Federal Housing Finance Agency Office of Inspector General (b) (6) office (b) (6) cell (b) (6) main line From: (b) (6) Sent: Friday, November 09, 2012 4:59 PM To: (b) (6) Subject: Good article on British Investigation into RBS and UBS on Libor Probe FYI - <http://www.bloomberg.com/news/2012-11-09/rbs-ubs-traders-said-to-face-arrest-in-libor-probe.html> Regards,

**Attachment #1**

**image001.png**

**Image**



(b) (6)

Special Agent  
Office of Inspector General  
Federal Housing Finance Agency (FHFA)  
Detroit Field Office  
Mobile: (b) (6)  
FBI Detroit Desk: (b) (6)

# LIBOR

---

**Item ID:** 32200  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** [REDACTED] (b) (6)  
**Subject:** LIBOR  
**Sent:** November 9, 2012 5:30 PM  
**Received:** November 9, 2012 5:30 PM

Hi (b) (6), Hope all is well with you. Saw this in the papers and wondered if I could give you a call to trade notes. As you may guess, Uncle Sam is as interested in LIBOR as Her Majesty's Government appears to be. My office number is below – happy to call/email you at the office if you can provide your number. Best, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

**RE: FWDiSanto, Emilia (b) (6) : Good article on British Investigation into RBS and UBS on Libor Probe**

---

**Item ID:** 32201  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** (b) (6) </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8f32930fd2d14dc7954d6bccd9f382849-(b) (6)>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>, DiSanto, Emilia </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d94639648c304c1d8447667da03493cb-Emilia DiSa>  
**Subject:** RE: FWDiSanto, Emilia <Emilia.DiSanto@fhfaig.gov>: Good article on British Investigation into RBS and UBS on Libor Probe  
**Sent:** November 9, 2012 5:34 PM  
**Received:** November 9, 2012 5:34 PM

Hi (b) (6), Thanks for pointing this out to us here in Washington. The prospect of arrests had been rumored in London for a while, but this is the firmest indication I've seen. We'll see if the Limeys give them the full Giuliani. Tim From: (b) (6) Sent: Friday, November 09, 2012 5:24 PM To: Lee, Timothy Cc: Parker, Richard; DiSanto, Emilia Subject: FWDiSanto, Emilia (b) (6) Good article on British Investigation into RBS and UBS on Libor Probe Hi Tim, Thought you might have an interest in this article that (b) (6) (OI) brought to my attention Hope you have a lovely weekend (b) (6) Federal Housing Finance Agency Office of Inspector General (b) (6) office (b) (6) cell (b) (6) main line From: (b) (6) Sent: Friday, November 09, 2012 4:59 PM To: (b) (6) Subject: Good article on British Investigation into RBS and UBS on Libor Probe FYI - <http://www.bloomberg.com/news/2012-11-09/rbs-ubs-traders-said-to-face-arrest-in-libor-probe.html> Regards,

**Attachment #1**

**image001.png**

**Image**



(b) (6)

Special Agent

Office of Inspector General

Federal Housing Finance Agency (FHFA)

Detroit Field Office

Mobile: (b) (6)

FBI Detroit Desk: (b) (6)

**RE: FWDiSanto, Emilia [REDACTED] (b) (6) : Good article on British Investigation into RBS and UBS on Libor Probe**

---

**Item ID:** 32204  
**From:** [REDACTED] (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** RE: FWDiSanto, Emilia [REDACTED] (b) (6) Good article on British Investigation into RBS and UBS on Libor Probe  
**Sent:** November 10, 2012 10:37 AM  
**Received:** November 10, 2012 10:38 AM

Funny.. The Full Giuliani.... From: Lee, Timothy Sent: Friday, November 09, 2012 5:35 PM To: [REDACTED] (b) (6) Cc: Parker, Richard; DiSanto, Emilia Subject: RE: FWDiSanto, Emilia [REDACTED] (b) (6) : Good article on British Investigation into RBS and UBS on Libor Probe Hi [REDACTED] (b) (6) Thanks for pointing this out to us here in Washington. The prospect of arrests had been rumored in London for a while, but this is the firmest indication I've seen. We'll see if the Limeys give them the full Giuliani. Tim From: [REDACTED] (b) (6) Sent: Friday, November 09, 2012 5:24 PM To: Lee, Timothy Cc: Parker, Richard; DiSanto, Emilia Subject: FWDiSanto, Emilia [REDACTED] (b) (6) >: Good article on British Investigation into RBS and UBS on Libor Probe Hi Tim, Thought you might have an interest in this article that [REDACTED] (b) (6) (OI) brought to my attention Hope you have a lovely weekend, Sheila Sheila Peden Federal Housing Finance Agency Office of Inspector General [REDACTED] (b) (6) office [REDACTED] (b) (6) cell [REDACTED] (b) (6) main line From: [REDACTED] (b) (6) Sent: Friday, November 09, 2012 4:59 PM To: [REDACTED] (b) (6) Subject: Good article on British Investigation into RBS and UBS on Libor Probe FYI - <http://www.bloomberg.com/news/2012-11-09/rbs-ubs-traders-said-to-face-arrest-in-libor-probe.html> Regards,

Attachment #1

image001.png

Image



(b) (6)

Special Agent

Office of Inspector General

Federal Housing Finance Agency (FHFA)

Detroit Field Office

Mobile: (b) (6)

FBI Detroit Desk: (b) (6)

**RE:**

---

**Item ID:** 32203  
**From:** (b) (6)  
**To:** Timothy.Lee@fhfaoig.gov  
**Subject:** RE:  
**Sent:** November 12, 2012 9:39 AM  
**Received:** November 12, 2012 9:39 AM

Hi Tim, You're not the first person from DC to ask me about Libor. Do you know (b) (6) He's a senior policy advisor at the Treasury (in the Financial Stability Oversight Council). (b) (6) used to work with me at Lehman - a very good guy (b) (6) feel free to reach out to him. Anyway there's not much I can say about it unfortunately - it would be in an entirely different area from me (in markets and conduct). The best advice I can give is to go through your international division (or whatever area you use to contact foreign regulators) and go through the chain. If I enquire, I'm unlikely to get a response due to the sensitive nature of it. How long have you been at FHFA? You like living in the DC area? (b) (6) CFA | Risk Specialists Division - Structured Finance | Prudential Business Unit | Financial Services Authority 25 The North Colonnade | Canary Wharf | London E14 5HS Tel (b) (6) | Mob (b) (6) | Email (b) (6) From: Steve Baker [mailto:(b) (6)] Sent: 12 November 2012 14:11 To: (b) (6) Subject: Steve Baker (b) (6) (b) (6) From: "Lee, Timothy" <Timothy.Lee@fhfaoig.gov> Date: Fri, 9 Nov 2012 22:30:52 +0000 To: (b) (6) Subject: LIBOR Hi (b) (6), Hope all is well with you. Saw this in the papers and wondered if I could give you a call to trade notes. As you may guess, Uncle Sam is as interested in LIBOR as Her Majesty's Government appears to be. My office number is below - happy to call/email you at the office if you can provide your number. Best, Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821  
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\*\*\*\*\*

## **Do you have a copy of the final Libor memo?**

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**Item ID:** 32206  
**From:** Phillips, Wesley (b) (6)  
**To:** Lee, Timothy <Timothy.Lee@fhfaoig.gov>  
**Subject:** Do you have a copy of the final Libor memo?  
**Sent:** November 14, 2012 9:55 AM  
**Received:** November 14, 2012 9:55 AM

Thanks Wes

# Cleveland Fed LIBOR paper

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**Item ID:** 32207  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Linick, Steve </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=28c2cf7b529749f09f7ceff9f71a1cd9-Steve Linic>  
**Cc:** Parker, Richard </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=35b52473fd4b4574add82079a96054be-Richard Par>  
**Subject:** Cleveland Fed LIBOR paper  
**Sent:** November 14, 2012 10:03 AM  
**Received:** November 14, 2012 10:03 AM

Hi Steve, I took a look at the article you mentioned yesterday. Its primary focus is on alternatives to LIBOR in consumer mortgages, especially in light of the recent allegations. There are, of course, homeowner lawsuits alleging that lenders inflated LIBOR settings in an effort to increase interest income on their adjustable rate mortgages. (b) (5)

According to the Federal Reserve Bank of St Louis , ARMs are most commonly tied to COFI, rather than LIBOR. (One-year Treasury rates are another commonly used index.) Thus, readily available alternatives to LIBOR already exist and are accepted by the markets. (b) (5)

. I will keep an eye on this going forward, but at the moment do not see cause for further action. Tim ----- Timothy Lee Senior Policy Advisor, FHFA-OIG 202-730-2821

## **FW: Message from Shared-Printer-1**

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**Item ID:** 32211  
**From:** Lee, Timothy </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9770d766b6642c4ac0f9f116d0b180d-Timothy Lee>  
**To:** Phillips, Wesley </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1881bcb698c45b096269b8112f87787-Wesley Phil>  
**Subject:** FW: Message from Shared-Printer-1  
**Sent:** November 14, 2012 10:05 AM  
**Received:** November 14, 2012 10:05 AM

Hi Wes, Be forewarned, it's not MILSPEC. Tim From: Linick, Steve Sent: Monday, November 05, 2012 5:24 PM To: Bloch, David; Wu, Simon; Lee, Timothy Cc: Grob, George; Frost, David; Parker, Richard; Stephens, Michael; DiSanto, Emilia Subject: FW: Message from Shared-Printer-1 Folks Very nice job on this memo. I forwarded to the Director and asked for written comments by Nov. 16. Please do not disseminate the memo to anyone outside the agency until further notice from me. tx From: Linick, Steve Sent: Friday, November 02, 2012 5:50 PM To: 'DeMarco, Edward' Subject: FW: Message from Shared-Printer-1 Hi Ed As promised, I am forwarding the memo report that my team produced regarding LIBOR. As indicated in my cover memo, we are treating this like any other report insofar as we are requesting written comments from the Agency regarding our recommendations to study the issue. Let me know if you have any questions or concerns. Have a great weekend. Steve From: (b) (6) Sent: Friday, November 02, 2012 3:19 PM To: Linick, Steve Subject: Message from Shared-Printer-1 (b) (6) Federal Housing Finance Agency Office of Inspector General (b) (6) office (b) (6) cell (b) (6) main line

**Attachment #1**

**Memo 11022012.pdf**

**Original view**

14 pages (displayed on pages 3 to 16)



**OFFICE OF INSPECTOR GENERAL**  
Federal Housing Finance Agency

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400 7th Street, S.W., Washington DC 20024

To: Edward J. DeMarco, Acting Director  
From: Steve A. Linick, Inspector General   
Subject: Potential losses to Fannie Mae and Freddie Mac from LIBOR manipulation  
Date: November 2, 2012

---

Please find attached a staff memorandum report detailing concerns about financial losses that Fannie Mae and Freddie Mac (the Enterprises) may have sustained due to manipulation of the London Interbank Offered Rate (LIBOR). As you know, the Department of Justice announced on June 27, 2012, an agreement with Barclays Bank Plc (Barclays) in which the bank admitted to manipulating LIBOR for its own advantage over a period of years. Federal, state, and foreign government investigations into possible LIBOR manipulation are ongoing, as are a number of high-profile civil suits predicated upon such manipulation.

FHFA-OIG's interest in the consequences of possible LIBOR manipulation upon the Enterprises stems directly from its core mission to prevent and detect fraud and abuse in FHFA's programs and operations. Members of my staff began their work on this topic within days of the Department of Justice's announcement of its agreement with Barclays. On September 6 and 11, they shared their preliminary analysis with members of your senior staff and, at about the same time, with both Enterprises.

The enclosed memorandum report outlines my staff's LIBOR loss estimates and offers recommendations for Agency action to recover any such losses on behalf of the Enterprises. In light of the fact that my staff has preliminarily estimated that the Enterprises may have suffered more than \$3 billion in such losses, I believe this matter warrants the Agency's attention. I would appreciate if the Agency could provide written comments to OIG's recommendations by November 16, 2012. Please do not hesitate to contact me if you have any questions about this matter.



## OFFICE OF INSPECTOR GENERAL

Federal Housing Finance Agency

---

400 7th Street, S.W., Washington DC 20024

**To:** Steve A. Linick, Inspector General

**From:** Timothy Lee, Senior Policy Advisor, Office of Policy, Oversight and Review  
David P. Bloch, Director, Division of Mortgage, Investments and Risk Analysis,  
Office of Evaluations  
Simon Z. Wu, Chief Economist, Office of Policy, Oversight and Review

**Through:** Richard Parker, Director, Office of Policy, Oversight and Review, and  
George P. Grob, Deputy Inspector General, Office of Evaluations

**Subject:** Potential losses to Fannie Mae and Freddie Mac due to LIBOR manipulation

**Date:** October 26, 2012

The London Interbank Offered Rate (LIBOR) is a market-standard interest rate index used extensively by participants in the global financial markets.<sup>1</sup> It is used to calculate payments on over \$300 trillion of financial instruments and has been described as “the most important figure in finance.”<sup>2</sup> LIBOR is determined by daily polls of 18 leading financial institutions (16 firms through 2010), which are asked to estimate their own short-term borrowing costs. The highest four and lowest four submissions are eliminated, and LIBOR is calculated by averaging the remaining ones.<sup>3</sup>

In a June 2012 settlement with British and U.S. authorities, including the Department of Justice (DOJ), Barclays Bank Plc (Barclays) admitted to submitting falsified borrowing cost data in an effort to manipulate LIBOR to its own advantage.<sup>4</sup> According to subsequent media reports, further LIBOR-related state and federal government investigations remain ongoing.<sup>5</sup> Additionally, several parties have filed civil damage claims seeking compensation for financial losses related to LIBOR manipulation.<sup>6</sup> These civil suits incorporate allegations that banks contributing to the determination of LIBOR strove to depress the published rates.<sup>a</sup>

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<sup>a</sup> Market participants deem lower borrowing costs to reflect better creditworthiness. Thus, publicly disclosed borrowing costs became a closely watched indicator of the industry’s stability during the financial crisis. As one academic observer noted, “Especially in 2008, the biggest problem was that all the banks wanted to claim they were able to borrow more cheaply than was in fact the case, so as not to heighten concerns about their creditworthiness.” University of Pennsylvania, [“The LIBOR Mess: How Did It Happen – And What Lies Ahead?”](#) July 18, 2012.

Fannie Mae and Freddie Mac (collectively, the Enterprises) rely upon LIBOR in the determination of interest payments on their sizable investments in floating-rate financial instruments, such as mortgage-backed securities and interest rate swaps. Many of the banks that contribute to the LIBOR calculation also have existing commitments to pay the Enterprises hundreds of millions of dollars in such LIBOR-based interest payments. As detailed under the “Analysis” portion of this document, our preliminary review of the Enterprises’ published financial statements and publicly available historical interest rate data indicates that, during conservatorship, the Enterprises may have suffered \$3 billion in cumulative losses from any such manipulation. Those losses would ultimately have been borne by the Department of the Treasury (Treasury), through its Senior Preferred Stock Purchase Agreements (PSPAs) with the Enterprises.

Because of the seriousness of these allegations and the possibility that Treasury and the Enterprises may have suffered significant losses due to LIBOR manipulation, we recommend that FHFA take three steps, outlined in further detail below:

- Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation;
- Promptly consider options for appropriate legal action, if warranted; and
- Coordinate efforts and share information with other federal and state regulatory agencies.

## **Background**

Since September 6, 2008, the Enterprises have operated under FHFA conservatorship.<sup>7</sup> Under the terms of the conservatorship, Treasury has ensured the Enterprises’ ability to remain viable entities through PSPAs with each. Under the terms of the PSPAs, Treasury provides capital funding directly to the Enterprises in amounts necessary to ensure their continued solvency.<sup>8</sup> To date, the federal government has provided the Enterprises over \$187 billion.<sup>9</sup>

As part of their business, the Enterprises have always held substantial quantities of floating-rate assets on which interest is recalculated and paid each month or quarter based on currently prevailing short-term rates. Such investments are popular because, as compared to assets that pay a fixed interest rate throughout their terms, floating-rate assets greatly reduce bondholders’ market risk that their investments’ value may decline due to adverse interest rate movements. The Enterprises’ two primary categories of floating-rate investments include:

- Floating rate bonds. Many securities are structured in this fashion. For example, according to its public financial statements, Freddie Mac alone held approximately \$299 billion of floating rate securities upon entering conservatorship.<sup>10</sup>
- Interest rate swaps. Because American homeowners tend to prefer predictable mortgage payments, the Enterprises’ mortgage portfolios generally contain more fixed-rate loans

than floating-rate loans. As a result, the value of those portfolios may vary as interest rates fluctuate. However, the Enterprises also invest in interest-rate swaps, contracting with large financial institutions for the obligation to pay them fixed-rate interest streams in exchange for the right to receive corresponding floating-rate ones.<sup>b</sup> These swaps effectively offset the mortgage loans' fluctuations in value, resulting in stable combined portfolio valuations even if interest rates rise or fall. We estimate that the Enterprises received floating-rate interest payments on a net total of \$373 billion in face, or "notional" amount of interest rate swaps upon entering conservatorship.

The interest due for such floating rate obligations is recalculated for each payment period by reference to the current value of LIBOR.

### **Analysis**

As a first step in our analysis, we compared the historical data on two floating rate indices:

- 1-month<sup>11</sup> LIBOR rates; and
- The Federal Reserve's published Eurodollar deposit rates (Fed ED) for 1-month<sup>12</sup> obligations. Like LIBOR, this data series is designed to measure short-term bank borrowing costs via polling of financial institutions. However, the Federal Reserve measure polls a broader range of institutions and is rarely referenced in floating rate financial obligations.

Our examination of daily records for 1-month Fed ED and 1-month LIBOR indicates that the two rates remained very close from the earliest point we reviewed, the beginning of 2000, until mid-2007. During that period, the largest divergence between the two indexes appeared shortly after September 11, 2001, when LIBOR *exceeded* Fed ED by as much as 0.41%. Indeed, on average the two measures remained within 0.06% of each other during that period, with LIBOR falling below Fed ED on less than one business day of each nine. The close correspondence of these two measures conformed to the expectations of market observers. As a former Federal Reserve economist said, "Effectively, these two rates should be the same as they are the same instrument."<sup>13</sup>

However, beginning in early 2007 emerging declines in home prices had begun to place strains on the financial system. New Century Financial, a leading home loan originator, filed for bankruptcy in April.<sup>14</sup> Adding to the stress were media reports of precipitous decay in two high-profile mortgage-backed securities hedge funds sponsored by Bear Stearns, a leading U.S.

---

<sup>b</sup> While the Enterprises may enter into both pay-floating rate and receive-floating rate swaps, in order to offset the risk of their (principally fixed-rate) mortgage assets, historically their overall net investment in interest rate swaps has been to receive floating-rate payments.

investment bank. These began to emerge in mid-June,<sup>15</sup> followed promptly by the funds' bankruptcy filings at the end of July.<sup>16</sup>

As the financial crisis began to metastasize, LIBOR and Fed ED began to diverge substantially, eventually by as much as three percentage points at the end of September 2008. Moreover, in a marked contrast with

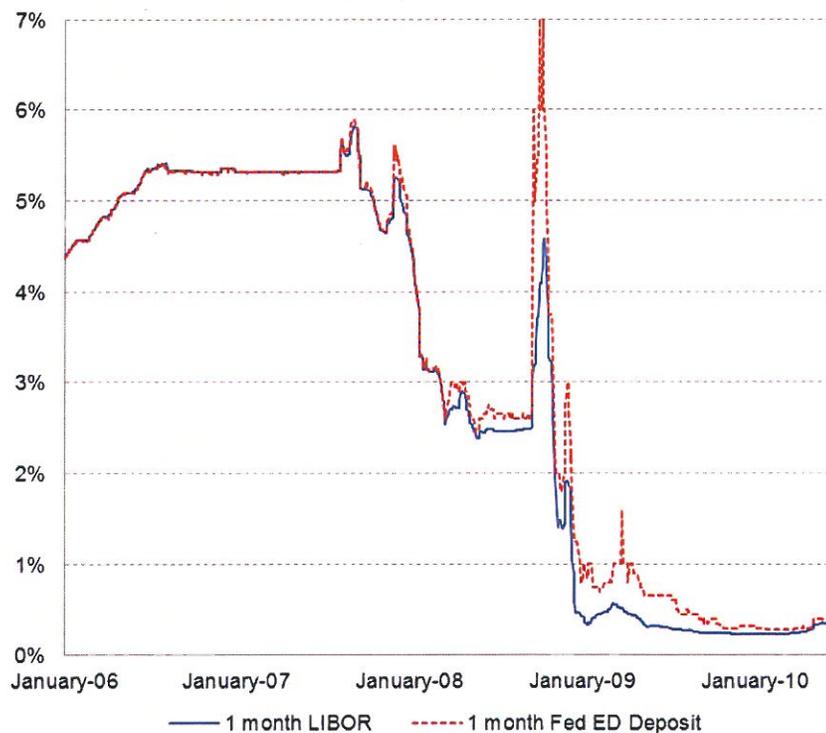
previous behavior, LIBOR began to fall below Fed ED consistently. Figure 1 illustrates the recent divergence of these two measures, beginning in mid-2007.

This anomaly has been cited in civil complaints as evidence of financial institutions' LIBOR manipulation.<sup>17</sup> Moreover, it is consistent with DOJ's statement of facts regarding Barclays' admitted LIBOR manipulation, which reads in part:

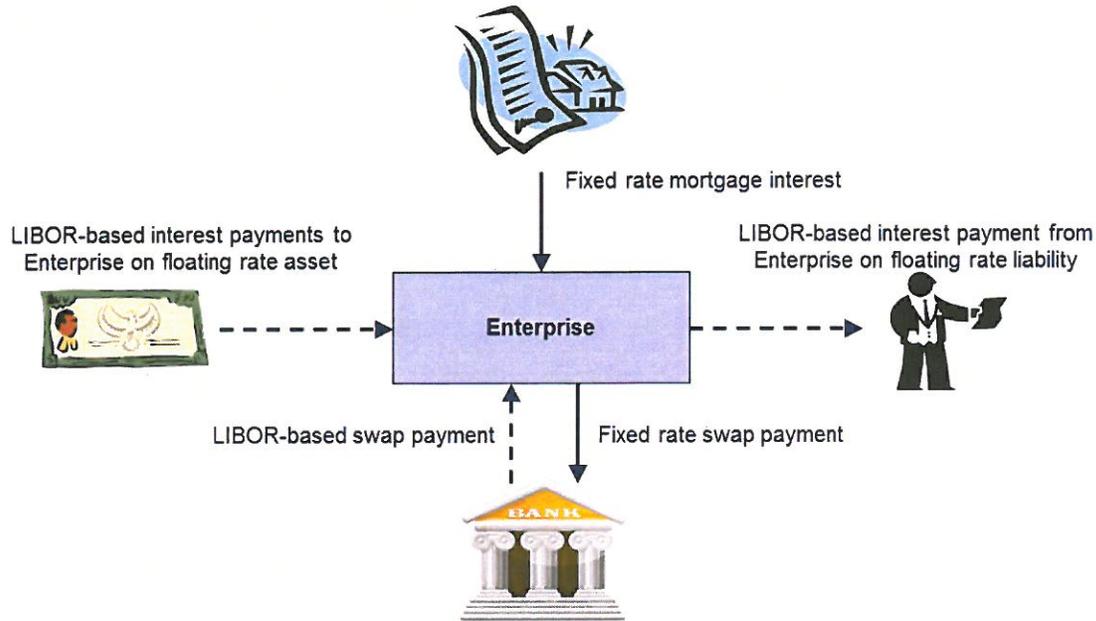
... between approximately August 2007 and January 2009, in response to initial and ongoing press speculation that Barclays's high U.S. Dollar LIBOR submissions at the time might reflect liquidity problems at Barclays, members of Barclays management directed that Barclays's Dollar LIBOR submissions be lowered. This management instruction often resulted in Barclays's submission of false rates that did not reflect its perceived cost of obtaining interbank funds.<sup>18</sup>

Because the Enterprises receive LIBOR-based floating rate payments on their floating rate bonds and interest rate swaps, the principal effect on them of any downward manipulation of LIBOR would be reduced interest payments with respect to their holdings of floating rate securities and interest rate swaps. (This is partially offset by lower borrowing costs on the Enterprises' own floating-rate liabilities, a factor we have considered in our estimation of Enterprise losses.)

**Figure 1. Federal Reserve Eurodollar Deposit Rate vs LIBOR, 1Q06-2Q10**



**Figure 2. LIBOR-Based Payments to and From the Enterprises**



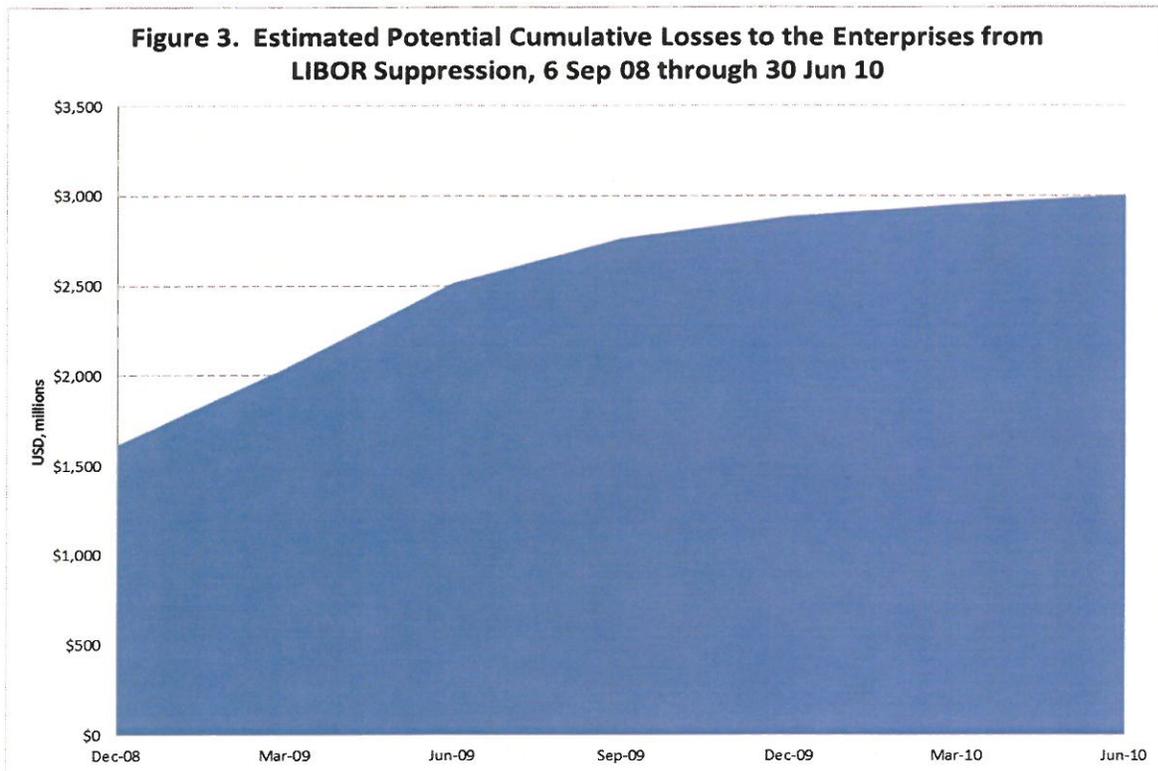
To the extent that the Enterprises suffered such “short-changing” of LIBOR-related interest payments after September 6, 2008, these practices contributed to the operating losses made whole by Treasury’s investments under the PSPAs. Therefore, it stands to reason that any manipulation of LIBOR may have inflicted meaningful losses on Treasury and the taxpayers.

To gauge the effect of possible LIBOR manipulation on the Enterprises, we undertook a three-step analytical process:

- First, we measured the daily divergence between 1-month LIBOR and the corresponding Fed ED rate (essentially treating the latter as the correct benchmark rate), and calculated its average value for each calendar quarter since the Enterprises entered conservatorship.<sup>c</sup>
- Second, we reviewed the Enterprises’ publicly available financial statements to develop rough estimates of their holdings of variable rate securities, interest rate swaps, and variable rate liabilities for each quarter.
- Finally, using these figures, we calculated an estimate for the additional quarterly net interest payments that the Enterprises would have received if LIBOR had matched the corresponding Fed ED rate since conservatorship.<sup>d</sup>

<sup>c</sup> To simplify our calculations, we assumed that all Enterprise floating rate assets referenced 1-month LIBOR. In practice, mortgage-related bonds and interest rate swaps typically reference either 1-month or 3-month LIBOR.

<sup>d</sup> Further details on our methodology are available in the Appendix.



Using this methodology, we estimate that, from the beginning of the Enterprises’ conservatorship in 2008 through the second quarter of 2010,<sup>19</sup> net Enterprise losses on their holdings of floating rate bonds and interest rate swaps may have exceeded \$3 billion. Over half of those potential losses appear to have taken place in the fourth quarter of 2008 alone.<sup>e</sup>

With respect to the Enterprises’ interest rate swaps, it is notable that the leading providers of these instruments are many of the same institutions that contribute to the determination of U.S. dollar LIBOR. Figure 4 presents a table of banks recently identified by the Federal Reserve Bank of New York as major derivatives dealers.<sup>20</sup> Ten of these fourteen major derivatives dealers also contribute to the poll used to determine LIBOR. Collectively, these dealers both participate in setting LIBOR and make LIBOR-based payments to their transaction partners, or counterparties, under the terms of their interest rate swaps. If the Enterprises conduct most of their derivatives business with these institutions, the potential for conflicts of interest is readily apparent.

<sup>e</sup> We also estimate that the Enterprises may have suffered approximately \$750 million of net LIBOR-related losses after market turmoil began in mid-2007, but prior to entering conservatorship.

A comparable situation exists in the market for floating-rate securities. For example, of 2007’s ten leading underwriters of “private label” mortgage-backed securities,<sup>21</sup> four contributed to the determination of LIBOR. The Enterprises purchased significant quantities of such securities from these underwriters.<sup>22</sup>

However, our review of a small sample of offering documents for the Enterprises’ floating-rate

Figure 4.

Major Derivatives Dealers		Top Private Label MBS Underwriters 2007	
	LIBOR Contributor		LIBOR Contributor
Bank of America	✓	Lehman Brothers	
Barclays	✓	Bear Stearns	
BNP Paribas		Deutsche Bank	✓
Citibank	✓	Countrywide	
Credit Suisse	✓	RBS	✓
Deutsche Bank	✓	Credit Suisse	✓
Goldman Sachs		JPMorganChase	✓
HSBC Group	✓	Morgan Stanley	
JPMorganChase	✓	Washington Mutual	
Morgan Stanley		Merrill Lynch	
RBS	✓		
Societe Generale	✓		
UBS	✓		
Wachovia			

investments in this category failed to uncover any disclosure of risks that the underwriters could manipulate LIBOR for their own advantage, to the detriment of bondholders.

In addition to the Barclays settlement, each LIBOR poll contributor among these dealers has been contacted by federal or state authorities with respect to ongoing investigations and/or is a named defendant in existing civil actions.<sup>23</sup>

**Recommendations**

In the context of active federal and state investigations into possible LIBOR manipulation, as well as the results of our own preliminary analysis of publicly available information, we believe that further investigation of the potential harm to Fannie Mae and Freddie Mac – and therefore to Treasury and, ultimately, the American taxpayer – of any LIBOR manipulation is firmly warranted. While FHFA-OIG should remain ready to offer advice and assistance, FHFA and the Enterprises themselves possess the detailed information needed to develop precise loss calculations and take any legal action that may prove appropriate. Therefore, we recommend that FHFA:

- **Require the Enterprises to conduct or commission detailed analyses of the potential financial losses due to LIBOR manipulation.** The Enterprises should possess detailed records of individual LIBOR-based assets and liabilities. An itemized analysis of these records would produce a better-founded estimate of their losses than is possible from reviewing only the Enterprises’ public 10-K and 10-Q filings.

- **Promptly consider options for appropriate legal action, if warranted.** If the existing accusations of LIBOR manipulation prove well founded then, in light of its obligations as their conservator, FHFA should have in place a plan by which to affect full recovery of any Enterprise funds lost and deter further malfeasance of this type. Due to the possibility that the Enterprises' legal options may soon be narrowed by statute of limitations considerations, FHFA should develop this plan promptly.
- **Coordinate efforts and share information with other federal and state regulatory agencies.** FHFA and FHFA-OIG can be valuable and effective partners with other federal and state agencies in their efforts on behalf of the public to recover losses and obtain justice for any wrongdoing that may ultimately be proven.

## Appendix

### Notes on Analytical Methodology

To estimate the Enterprises' potential losses due to LIBOR manipulation, we drew on two principal sources of information.

#### **LIBOR Benchmarks**

First, we referenced Federal Reserve Bank of St. Louis repositories of daily historical data for the following data series:

- [1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#). According to the Federal Reserve, this information is provided by the British Bankers' Association. The Federal Reserve describes LIBOR as "the most widely used 'benchmark' or reference rate for short term interest rates."
- [1-Month Eurodollar Deposit Rate \(London\)\(DED1\)](#). This information is compiled by the Federal Reserve itself, working with Bloomberg and ICAP Plc, a bond brokerage firm.

We also compiled similar samples for 3-month rates in each case. Comparisons of both the 1-month and 3-month indices revealed significant rate discrepancies between LIBOR and the Federal Reserve index, beginning in 2007. The Bloomberg story cited in the body of the report includes the former Federal Reserve economist's quote that "effectively, these two rates should be the same as they are the same instrument." Several civil lawsuits, including those brought by [Charles Schwab](#) and the [City of Baltimore](#), cite the emergence of these discrepancies as evidence of malfeasance.

Notably, other commentators have also cited additional market indicators as evidence of potential LIBOR manipulation. For example, in a recent speech to the [European Parliament's Economic and Monetary Affairs Committee](#), Gary Gensler, head of the U.S. Commodity Futures Trading Commission, cited persistent anomalies compared to other short-term interest rate indexes, such as Euribor and non-dollar indexes, along with pricing in derivatives such as interest rate options and credit default swaps in questioning the recent behavior of LIBOR.

However, because of differences in currency or maturity of the other indicators compared to the Federal Reserve Eurodollar deposit rate, we chose the Federal Reserve index as the simplest and best benchmark for comparison. For the purposes of this analysis, it served as a proxy for the appropriate LIBOR setting. Thus, we assumed that observed differences between LIBOR and the Federal Reserve Eurodollar deposit rate could indicate the timing and extent of potential manipulation by LIBOR poll participants.

## Calculation of Enterprise Losses

Second, we assembled Fannie Mae and Freddie Mac balance sheet data for the relevant period from the Enterprises' published financial statements. For example, Freddie Mac data for 4Q08 are drawn from the [2008 10-K](#), including:

- Data on derivatives investments from Table 38, page 109. We calculated Freddie Mac's net receive-LIBOR interest rate swap investment as:
  - Pay-fixed (i.e. Freddie Mac receives LIBOR), *plus*
  - Basis (i.e. Freddie Mac and its counterparty exchange different sets of floating rate interest payments. Generally, these involve the Enterprise's payments of frequently used ARM indices, such as the Cost of Funds Index or the 12-month Constant Maturity Treasury rate, in exchange for LIBOR-based payments); *less*
  - Receive-fixed (i.e. Freddie Mac pays LIBOR).
- Data on Freddie Mac's variable-rate mortgage-related securities from information on the Enterprise's Mortgage-Related Investments Portfolio, Table 24, page 93.
  - We assumed that essentially all variable-rate MBS holdings calculated interest payments by reference to LIBOR.
  - Fannie Mae did not publish explicit information on its variable rate MBS, but did provide figures for all MBS held by its Capital Markets Group. To estimate Fannie Mae's variable-rate MBS investment holdings, we assumed that Fannie Mae's Capital Markets Group held the same proportion of variable rate securities held by Freddie Mac in its Mortgage-Related Investments Portfolio.
- Data on Freddie Mac's long-term debt liabilities, including variable-rate liabilities, in Table 8.3, page 224.
  - We assumed that essentially all long-term floating-rate debt obligations of the Enterprises calculated interest payments by reference to LIBOR.
  - Fannie Mae explicitly discloses floating-rate obligations in its financial statements.
  - Freddie Mac's reporting of floating-rate obligations for the time period under review is intermittent. Long-term variable-rate debt obligations are totaled as of December 31, 2009, and subsequently, but not for the 10Qs as of 1Q09, 2Q09, and 3Q09. Within the time period examined, the highest proportion of long-term variable-rate obligations to other long-term debt (i.e., direct obligations not brought onto the balance sheet by the requirements of SFAS 167) was 24.7%, reported as of 2Q10. We used that proportion to estimate Freddie Mac's variable-rate debt obligations when no other information was available.

- Except where explicitly disclosed, short-term variable rate obligations of the Enterprises were excluded from the analysis as a relatively minor component.

We calculated cash flow shortfalls to the Enterprises as equivalent to (a) the difference between 1-month LIBOR and the 1-month Federal Reserve Eurodollar deposit rate, multiplied by (b) (i) the notional amount of net receive-LIBOR swaps investments held by the Enterprises, plus (ii) the face value of Enterprise variable-rate mortgage-related securities net of their variable-rate liabilities. Cash flow shortfalls were calculated on a quarterly basis. We assumed reported figures remained constant within each quarter. We included a portion of the indicated cash flow shortfalls for 3Q08, prorated for the final 24 days of September.

We believe that direct cash flow shortfalls, due to reduced interest and swap payments on LIBOR-based investments held by the Enterprises, are likely to constitute the great majority of Enterprise financial losses resulting from any LIBOR manipulation. However, additional secondary effects of LIBOR manipulation may also affect the amount of such losses. These include, but are not limited to:

- Distortions in the volatility measures used to benchmark pricing of the Enterprises' interest rate options
- Effects on the interest rate futures market used to value interest rate swaps
- Effects on prepayment valuation models used to value MBS, which rely on short-term interest rate data as an input

However, we did not incorporate such factors into this analysis.

### **Limitations of Our Analysis**

The goal of this report is not to provide a definitive accounting of the Enterprises' losses, nor to demonstrate conclusively the culpability of specific organizations or individuals. We acknowledge the limitations inherent in any corporate financial analysis developed exclusively from public reports. However, this analysis does indicate that the numerous accusations of LIBOR manipulation raise legitimate concerns about their impact on the Enterprises. Accordingly, they warrant closer examination by FHFA and the Enterprises, which have access to the detailed asset-level records and information needed to generate a more accurate and precise figure for potential losses and provide guidance for any future action that may be required to protect the taxpayers.

For more details about this analysis, please contact Timothy Lee, Senior Policy Advisor, at (202) 730-2821 or [timothy.lee@fhfa.ig.gov](mailto:timothy.lee@fhfa.ig.gov).

## Endnotes

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- <sup>1</sup> British Bankers' Association, "[BBA LIBOR Explained](#)."
- <sup>2</sup> The Telegraph, "[LIBOR Scandal: Martin Wheatley's Speech](#)," September 28, 2012.
- <sup>3</sup> Thomson Reuters, "[Thomson Reuters Role in the Calculation and Distribution of BBA LIBOR™](#)", July 4, 2012. The number of poll contributors is cited in the Department of Justice's settlement documentation, "[Appendix A: Statement of Facts](#)."
- <sup>4</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.
- <sup>5</sup> See, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.
- <sup>6</sup> The Wall Street Journal, "[Suits Mount in Rate Scandal](#)," August 26, 2012.
- <sup>7</sup> Federal Housing Finance Agency, "[Statement of Director James A. Lockhart](#)", September 7, 2008, p.6.
- <sup>8</sup> Federal Housing Finance Agency, "[Mortgage Market Note 10-1](#)", January 20, 2010
- <sup>9</sup> Federal Housing Finance Agency, "[Data as of August 8, 2012 on Treasury and Federal Reserve Purchase Programs for GSE and Mortgage-Related Securities](#)."
- <sup>10</sup> Current and historical financial statement data for Freddie Mac can be found at [http://www.freddiemac.com/investors/sec\\_filings/?intcmp=AFIRSF](http://www.freddiemac.com/investors/sec_filings/?intcmp=AFIRSF). Data for Fannie Mae can be found at <http://www.fanniemae.com/portal/about-us/investor-relations/sec-filings.html>.
- <sup>11</sup> Federal Reserve Bank of St. Louis, "[1-Month London Interbank Offered Rate \(LIBOR\), based on U.S. Dollar \(USD1MTD156N\)](#)". Data obtained October 1, 2012.
- <sup>12</sup> Federal Reserve Bank of St. Louis, "[1-Month Eurodollar Deposit Rate \(London\) \(DED\)](#)". Data obtained October 1, 2012.
- <sup>13</sup> Bloomberg News, "[Fed's Eurodollar Rates Suggest Dollar LIBOR May Stabilize](#)", April 28, 2008.
- <sup>14</sup> See, for example, the *Report of the Financial Crisis Inquiry Commission*. Facts noted here are taken from [Chapter 12](#) of that document, page 233.
- <sup>15</sup> BusinessWeek, "[Bear Stearns' Subprime Bath](#)", June 12, 2007.
- <sup>16</sup> *Report of the Financial Crisis Inquiry Commission*, [Chapter 12](#), page 240.
- <sup>17</sup> See, for example, Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012, pp. 23-31.
- <sup>18</sup> U.S. Department of Justice, "[Barclays Bank PLC Admits Misconduct Related to Submissions for the London Interbank Offered Rate and the Euro Interbank Offered Rate and Agrees to Pay \\$160 Million Penalty](#)," June 27, 2012.

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<sup>19</sup> Media reports cite allegations that LIBOR manipulation continued through at least mid-2010. See, e.g., Washington Post, "[Trickle of LIBOR Lawsuits From Rate-Fixing Scandal Likely to Become Deluge](#)", July 30, 2012.

<sup>20</sup> Federal Reserve Bank of New York, "[An Analysis of OTC Interest Rate Derivatives Transactions: Implications for Public Reporting](#)," March 2012, p.2

<sup>21</sup> "Private label" MBS are those not brought to market and guaranteed through the Enterprises. See U.S. Securities and Exchange Commission, "[Mortgage-Backed Securities](#)." League table data provided by Inside Mortgage Finance, "Mortgage Market Statistical Annual."

<sup>22</sup> See, for example, Federal Housing Finance Agency, "[FHFA Sues 17 Firms to Recover Losses to Fannie Mae and Freddie Mac](#)."

<sup>23</sup> At least two complaints, those of Berkshire Bank and the City of Baltimore, name all 16 contributors to U.S. dollar LIBOR. Wall Street Journal, "[New York Lender Files LIBOR Lawsuit](#)", July 30, 2012, and Thomson Reuters, "[In re LIBOR-Based Financial Instruments Antitrust Litigation](#)," April 30, 2012. Also see with respect to federal and state investigations, inter alia, The New York Times, "[State Regulators Widen LIBOR Investigation](#)," August 15, 2012, and BusinessWeek, "[US LIBOR Probers Said to Seek London Trader Interviews](#)," September 27, 2012.