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FEDERAL RESERVE ANNOUNCES DELAY IN EFFECTIVENESS OF NEW “CONTROL” FRAMEWORK

To Our Clients and Friends:

Responding to the effects of COVID-19 on the U.S. economy and the desire of banks and investors to consult with Federal Reserve staff about the effects of the Federal Reserve’s new “control” rule on existing investments and relationships, the Federal Reserve announced that it was delaying the effective date of its new framework for analyzing “control” under the Bank Holding Company Act by two quarters, to September 30, 2020. The Gibson Dunn Client Alert on the new framework may be found [here](#).



Gibson Dunn’s lawyers are available to assist with any questions you may have regarding developments related to the COVID-19 pandemic. For additional information, please contact any member of the firm’s Coronavirus (COVID-19) Response Team.

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Please also feel free to contact the Gibson Dunn lawyer with whom you usually work or the following leaders and members of the Financial Institutions Group:

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