



April 18, 2014

Pam Martens
Wall Street On Parade

[REDACTED]
[REDACTED]

Dear Ms. Martens:

This is in response to your letter dated March 21, 2014, which was received in my office on March 24, 2014 for processing under the Freedom of Information Act, 5 U.S.C. 552.

You requested all records, documents, correspondence, emails, filings in any form in the possession of the OCC that relate to JPMorgan Chase (or any of its subsidiaries, divisions or affiliates) on the topic of Bank Owned Life Insurance (BOLI). You stated that you are specifically seeking records showing:

- the number of current and former employees who are insured by JPMorgan Chase or its subsidiaries, divisions or affiliates, under BOLI policies;
- the face amount of all of these policies;
- the rank of the employees who are insured; the annual revenue to JPMorgan Chase from cash buildup in these policies;
- the annual revenue to JPMorgan Chase from death benefits from these policies;
- the number of deceased each year from 2008 through March 21, 2014 who have generated death benefits under these policies; and
- any peer review data you have available comparing any of the above data for JPMorgan Chase, Bank of America, Wells Fargo, and Citigroup.

Documents located relevant to your request are being withheld by the authority of 5 U.S.C. 552(b)(4) and 12 C.F.R. 4.12(b)(4), a record that is privileged or contains trade secrets, or commercial or financial information, furnished in confidence, that relates to the business, personal, or financial affairs of any person; and 5 U.S.C. 552 (b)(8) and 12 C.F.R. 4.12(b)(8), a record contained in or related to an examination, operating, or condition report prepared by, or on behalf of, or for the use of the OCC or any other agency responsible for regulating or supervising financial institutions..

If you consider any of the above to be an improper denial of your request, you may appeal such denial to the Comptroller of the Currency. The appeal should be filed within 35 days of the date of this letter, should state the circumstances and reasons or arguments in support of the appeal,

Pam Martens
April 18, 2014
Page 2

and be submitted via our online FOIA application at <https://foia-pal.occ.gov/> or be mailed to the Manager, Disclosure Services & Freedom of Information Act Officer, Office of the Comptroller of the Currency, Communications Division, Suite 3E-218, Mailstop 6W-11, Washington, DC 20219.

Sincerely,

Frank D. Vance, Jr.

Frank D. Vance, Jr.
Manager, Disclosure Services & Freedom of Information Act Officer
Communications Division

#2014-00270-F