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Using Structure Central to Complete the FR Y-6

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The views expressed today are our own and not necessarily those of the Federal Reserve Bank of Philadelphia or the Federal Reserve System.

New FR Y-6 Requirements

This presentation is meant to be a supplement to the Ask the Fed Session from February 5, 2025 and the short, step-by-step Structure Central submission video posted on our website. It is not a repeat of those. While it may reiterate some of the points made, the goal is to provide more details about the changes to the FR Y-6.

Structure Central

All FR Y-6 Reporters must access Structure Central to compare their internal organizational structure records against the Federal Reserve's data.

- Structure Central URL: <https://www.frbervices.org/sign-in/structure-central.html>
- You must have already requested and received access for your holding company.
- Token must be inserted

THE FEDERAL RESERVE
FRBServices.org

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Structure Central Secure Logon

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Structure Central Secure Logon

The new Structure Central application must be accessed by *all* FR Y-6 Reporters to compare Report Items 2a (Organization Chart) and 2b (Domestic Branch Listing) to their internal records. This is required of *all* FR Y-6 Reporters even if you opt to send a hard copy FR Y-6, and even if no changes occurred to your organizational structure in the last fiscal year. Go to [frbervices.org](https://www.frbervices.org) to request and obtain access. Structure Central is also the new way to submit your FR Y-6 electronically. This will not cover every Structure Central screen since that was covered in the Ask the Fed session and the step-by-step submission video.

Structure Central and FR Y-6 Submissions

- All FR Y-6 Reporters must access Structure Central to compare their internal organizational structure records against the Federal Reserve's data.
- Structure Central has streamlined and enacted many time saving features to mitigate some issues that caused frequent revisions.
- We strongly suggest that you submit via Structure Central and not submit a hard copy Report.
- Hard copy Reports do not have these streamlined and time saving features.

To reiterate, Accessing Structure Central is a requirement for *all* FR Y-6 Reporters. You *must* use Structure Central to compare data. We strongly suggest that you submit your FR Y-6 via Structure Central and not send hard copy Reports. There are numerous steps that have been streamlined in Structure Central to ensure time savings in your FR Y-6 form submission. These are not available if you decide to submit a hard copy. The submissions and revisions through Structure Central are instantaneous as soon as proper documents are uploaded and submitted. Please save yourselves time, trouble and postage.

FR Y-6 Reporter

Top-tier holding company (not bank)

FR Y-6 Report

Dashboard

Create New

Create Annual Report of Holding Companies

Please indicate which Reporter and Report Date you'd like to submit for.

fak

6012180-FAKENAME BANCORP, INCORPORATED-10 INDEPENDENCE MALL-PHILADELPHIA-PENNSYLVANIA-UNITED STATES-BANK HOLDING COMPANY

Next

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Once you are logged in, click on “Create New” near the top-left of your screen. If you do not see that, you may need to click on the arrow next to “FR Y-6 Reporter.” If you do not see *that*, click on the three horizontal lines at the top-left corner of your screen. Then, type in the first few letters of the FR Y-6 Reporter’s legal name or the first few digits of its RSSD ID number and Structure Central will display a list of potential matches to click on. The FR Y-6 Reporter is usually the top-tier holding company of your organization, not the bank, so if you are not finding it, be sure you are searching for the correct company.

Report Item 1 (Annual Report)

If you did not submit an FR Y-10 to update changes in your SEC registration status, you may encounter troubles in Report Item 1 when submitting the FR Y-6 Report.

For holding companies not registered with the SEC, indicate status of Annual Report to Shareholders:

- Not applicable
- Included with the report
- Will be sent under separate cover
- Not prepared

If our database indicates that your institution is registered with the SEC, the selection is defaulted to "Not Applicable." Otherwise, choose one of the other three options. If your SEC registration status changed but you did not submit an FR Y-10 to update us, you may have trouble submitting your FR Y-6.

Report Item 2a (Organization Chart)

5 Organization Chart

Displayed is an Organization chart of FR Y-10 reportable entities as of the current fiscal year-end. Respondents are required to verify and reconcile the information shown against their internal Organization structure as of its fiscal year-end.

Line Num	RSSD ID	Legal Name	Legal Entity Identifier	City	State/Country	State/Country of Incorporation	Basis of Relationship	Percentage Ownership
1	6012180	FAKENAME BANCORP, INCORPORATED	254900QREAFCA8RIWH32	PHILADELPHIA	PA	PA		
2	6012199	BANK OF FAKENAME	8945002PLV6YXT6IR936	PHILADELPHIA	PA	PA	Vtg Eqty	100
5	6012210	FAKENAME PROPERTIES, LLC	969500VZ3XYE0P95Z006	PHILADELPHIA	PA	PA	Vtg Eqty, Other	General Partner/Managing Member
4	6012201	FAKENAME ENTERPRISES, INCORPORATED	549300053YVTKKSJCB13	PHILADELPHIA	PA	PA	Vtg Eqty	80

Per the FR Y-10 instructions, the percentage ownership in a Banking or Savings and Loan company is rounded down to the nearest whole percentage. The organization chart displays the percentage ownership in a Nonbanking company as 100 if it is wholly-owned and displays the lower bound of the applicable percentage range if held less than 100%.

Please note that the chart may contain companies and/or relationships that are reported by other Reporters (e.g., jointly-held entities) and respondents are not required to verify information relating to such companies and/or relationships.

Asterisk * next to line number indicates that confidentiality is granted or pending

[Download Organization Chart](#)

Were there any changes to Item 2a Organization Chart from the prior year that are not shown above?

No - all changes are shown above

Yes - all changes are not shown above

If there were changes to the organization structure that are not shown, respondents must submit an FR Y-10 report. If the respondent previously submitted an FR Y-10 and there is an error in the organization structure shown, please contact your local Reserve Bank for assistance.

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Unlike in the past when *you* would provide *us* with your organization chart, *we* will now provide *you* with a list of FR Y-10 Reportable companies in your organization according to our database. You can download the chart as a Microsoft Excel spreadsheet if that makes it easier to review, but that is for your use only. Please do not send us the spreadsheet or attempt to upload it to Structure Central.

For every company in your organization, you are required on an annual basis to compare the following Items to your internal records:

- (1) Full legal name. Abbreviations should only be used if part of the legal name;
- (2) Legal entity identifier (or LEI), if the entity has one;
- (3) City and state of the entity's physical address (or city and country if foreign);
- (4) State of incorporation (or country of incorporation if foreign). Note that federally chartered entities do not have a state of incorporation and should be blank;
- (5) Intercompany ownership and control relationships. These are noted by indentations. In this example, Fakename Bancorp Inc. owns Bank of Fakename and Fakename Enterprises Inc., and Bank of Fakename owns Fakename Properties LLC; and
- (6) Percent ownership by each direct holder, except for LLCs and partnerships.

Report Item 2a (Organization Chart) continued

5 Organization Chart

Displayed is an Organization chart of FR Y-10 reportable entities as of the current fiscal year-end. Respondents are required to verify and reconcile the information shown against their internal Organization structure as of its fiscal year-end.

Line Num	RSSD ID	Legal Name	Legal Entity Identifier	City	State/Country	State/Country of Incorporation	Basis of Relationship	Percentage Ownership
1	6012180	FAKENAME BANCORP, INCORPORATED	254900QREAFCA8RIWH32	PHILADELPHIA	PA	PA		
2	6012199	BANK OF FAKENAME	8945002PLV6YXT6IR936	PHILADELPHIA	PA	PA	Vtg Eqty	100
5	6012210	FAKENAME PROPERTIES, LLC	969500VZ3XYE0P95Z006	PHILADELPHIA	PA	PA	Vtg Eqty, Other	General Partner/Managing Member
4	6012201	FAKENAME ENTERPRISES, INCORPORATED	549300053YVTKKSJCB13	PHILADELPHIA	PA	PA	Vtg Eqty	80



Per the FR Y-10 instructions, the percentage ownership in a Banking or Savings and Loan company is rounded down to the nearest whole percentage. The organization chart displays the percentage ownership in a Nonbanking company as 100 if it is wholly-owned and displays the lower bound of the applicable percentage range if held less than 100%.

Please note that the chart may contain companies and/or relationships that are reported by other Reporters (e.g., jointly-held entities) and respondents are not required to verify information relating to such companies and/or relationships.

Asterisk * next to line number indicates that confidentiality is granted or pending

[Download Organization Chart](#)

Were there any changes to Item 2a Organization Chart from the prior year that are not shown above?

No - all changes are shown above Yes - all changes are not shown above

If there were changes to the organization structure that are not shown, respondents must submit an FR Y-10 report. If the respondent previously submitted an FR Y-10 and there is an error in the organization structure shown, please contact your local Reserve Bank for assistance.

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Percent ownership for nonbanking companies is Reported on the FR Y-10 in “buckets.” Less than 25%, 25% to 50%, greater than 50% to less than 80%, 80% to less than 100%, and 100%. In Structure Central, you will see the bottom end of the bucket. In this example, Fakename Enterprises Inc. is in the 80% to less than 100% bucket. If your internal records indicate that it is anywhere from 80% to less than 100% owned, this is considered a match.

For LLCs and partnerships, in lieu of percent ownership, the direct holder is designated as the managing member or non-managing member (for LLCs), or the general partner or limited partner (for partnerships).

If any of the six components do not match your internal records for any company, or if the number of companies listed does not match your internal records, choose “Yes, all changes are NOT shown above” and submit an FR Y-10 for the change. If you already submitted an FR Y-10 but a discrepancy still exists, or if the discrepancy is an error as opposed to a change that occurred at some point in time, please contact us.

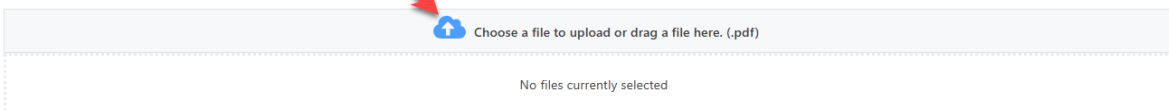
If everything matches your internal records, then choose “No, all changes are shown above.”

Report Item 2a (Organization Chart) continued

Organization structure should provide context for each reportable bank or subsidiary.

Additional companies reportable on the FR Y-6 that are not reportable on the FR Y-10 are not part of the organization chart verification process. Respondents are required to attach an updated list or organization chart as of the current fiscal year-end if there were changes (including requests for confidentiality) to FR Y-10 exempt entities that are reportable on the FR Y-6. Submission of this Item without an attachment indicates that there are no additional companies reportable on the FR Y-6 that are not reportable on the FR Y-10.

Attachments



Choose a file to upload or drag a file here. (.pdf)

No files currently selected

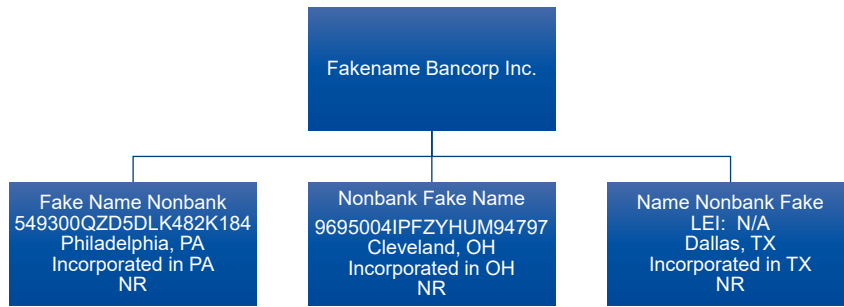
Next

As the Organization chart in Structure Central lists only the entities that are both FR Y-6 *and* FR Y10 Reportable, at the bottom of the screen, you are asked if changes occurred to companies that are FR Y-6 Reportable but *not* FR Y-10 Reportable. These entities are more than 5% controlled but less than 25% controlled by bank holding companies and intermediate holding companies, and more than 5% controlled but less than *or equal to* 25% controlled by savings & loan holding companies.

If changes occurred to any of those companies, then attach a PDF file by clicking on the cloud or dragging the file into the space below it. The file should include *only* the FR Y-6 but *not* FR Y-10 Reportable entities in your organization as of the fiscal year-end date, with all six components you checked for on the organization chart. However, instead of listing percent ownership between entities, type "NR" to indicate they are not FR Y-10 Reportable.

If no changes occurred to those companies, or if your organization has no such companies, simply click on "Next."

FR Y-6 Reportable Entities that are Not FR Y-10 Reportable



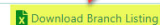
Here is an example of what you should include if changes occurred to nonbanking companies that are FR Y-6 Reportable but *not* FR Y-10 Reportable. You can provide the companies in diagram or list format as long as all six required components are included.

Report Item 2b (Domestic Branch Listing)

6 Domestic Branch Listing

Displayed is a domestic branch listing as of the current fiscal year-end. Respondents are required to verify and reconcile the information shown against its internal organization structure as of its fiscal year-end.

Branch Service Type	RSSD ID	Legal Name / Popular Name	Street Address	City	County	State / Province	Zip Code	Country
Head Office	6012199	BANK OF FAKENAME	10 INDEPENDENCE MALL	PHILADELPHIA	PHILADELPHIA	PA	19106	UNITED STATES
Full Service	6012229	FAKENAME BRANCH	1455 EAST 6TH STREET	CLEVELAND	CUYAHOGA	OH	44114	UNITED STATES



Were there any changes to Item 2b Domestic Branch Listing from the prior year that are not shown above?

No - all changes are shown above Yes - all changes are not shown above

If there were changes to the branch listing that are not shown, respondents must submit an FR Y-10 report. If the respondent previously submitted an FR Y-10 and there is an error in the branch listing shown, please contact your local Reserve Bank for assistance.

Next

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You are then taken to Report Item 2b (Domestic Branch Listing). As we mentioned, this step is required of *all* FR Y-6 Reporters. Similar to the organization chart, you are shown a list of your bank's branches according to our database. You also have the option to download the list as a Microsoft Excel spreadsheet and review it that way, but that is for your use only. Please do not send us the spreadsheet or attempt to upload it to Structure Central.

For every branch, you are required on an annual basis to compare the following items to your internal records:

1. Branch popular name,
2. Address of its physical location, including street number and name, city, county, state, ZIP code, and country; and
3. The branch's service type.

If any of the three components do not match your internal records for any branch, or if the number of branches shown does not match your internal records, choose "Yes, all changes are NOT shown above" and submit an FR Y-10 for the change. If you already submitted an FR Y-10 but a discrepancy still exists, or if the discrepancy is an error as opposed to a change that occurred at some point in time, please contact us.

If everything matches your internal records, then choose “No, all changes are shown above.”

New FR Y-6 Templates

New Templates for Securities Holders & Insiders

- Templates are required (no other format is acceptable)
- Use new Report form (below) only for hard copy submissions
- Use XLSX or XML templates for Structure Central Submissions
- Do *not* convert to PDF for Structure Central Submissions

FR Y-6
Page 3 of 4

Report Item 3(1): Securities Holders as of the Fiscal Year-End

Use this schedule to complete Report Item 3(1) to list each securities holder, of record, that directly or indirectly owns, controls, or holds with power to vote 5 percent or more of any class of voting securities of the holding company as of the last day of the fiscal year-end of the holding company. Report Item 3 should be reported for the top-tier holding company and each lower-tier holding company. Use additional pages as needed.

Legal Title of Holding Company (FR Y-6 Y7)

Item	Name (Column A)	City (Column B)	State (Column C)	Country (Column D)	Country of Incorporation (Column E)	Describe the provisions of the trust or plan (Column F)	For individuals, identify in column seven name of individuals or group subject to control (Column G)	For trusts, identify each trustee or trustee in individual that has the power to vote (Column H)	Number of Securities				Percent of each class of voting securities owned, controlled, or held with power to vote in the holding company (Column M)	
									Common Stock (Column I)	Warrants (Column J)	Options (Column K)	Other (Column L)		

Add Page 10/20/14

Report Items 3 (Securities Holders) and 4 (Insiders) now have templates that *must* be used by *all* FR Y-6 Reporters. The templates are required. You may *not* use any other format. Here, you can see the new Report Item 3 from the new *Report form*. This is to be used *only* for hard copy submissions, though we strongly encourage you to submit electronically since all FR Y-6 Reporters have to log in to verify their organization chart and branches anyway. For Structure Central submission, you can choose between the XLSX versions, which are for Microsoft Excel, or the XML versions. We recommend using the Microsoft Excel versions.

The following slides will show the *Structure Central* templates. Do *not* use the *hard copy* form for Structure Central submission, and do *not* convert your XLSX or XML file to PDF format. Conversely, do *not* use the *Structure Central* versions for hard copy submissions.

Report Item 3 (Securities Holders)

If changes occurred to your Securities Holders, **you must use the new templates.**

Item 3(1)(a) Name	Item 3(1)(b) City	Item 3(1)(c) State	Item 3(1)(d) Country	Item 3(1)(e) Country of Citizenship or Incorporation	Item 3(1)(f) Describe the provisions of the trust or plan	Item 3(1)(g) For Individuals Acting in Concert, Identify Name of Individual or Group Acting in Concert.	Item 3(1)(h) For Trusts, Identify each trustee or designated individual that has the power to vote	Item 3(1)(i) Number of Securities - Common Stock	Item 3(1)(j) Warrants	Item 3(1)(k) Number of Securities - Options	Item 3(1)(l) Number of Securities - Other	Item 3(1)(m) Percent of each class of voting securities owned, controlled, or held with power to vote in the holding company
FDHCPV72	FDHCPV73	FDHCPV74	FDHCPV75	FDHCPV76	FDHCPV77	FDHCPV78	FDHCPV79	FDHCPV80	FDHCPV81	FDHCPV82	FDHCPV83	FDHCPV84

This is the Report Item 3 Microsoft Excel template for *Structure Central* submissions. As previously mentioned, if submitting a *hard copy* FR Y-6, you must use the new template on the new *Report form*.

Note that this template for Report Item 3 contains two tabs (or sheets) at the bottom. Both must be completed. Remember to add the name of your holding company to the top of each tab.

Report Item 3(1) Example

Legal Name of Holding Company: Fake Name Bancorp, Inc.													
FDHCPV71													
Item 3(1)(a)	Item 3(1)(b)	Item 3(1)(c)	Item 3(1)(d)	Item 3(1)(e)	Item 3(1)(f)	Item 3(1)(g)	Item 3(1)(h)	Item 3(1)(i)	Item 3(1)(j)	Item 3(1)(k)	Item 3(1)(l)	Item 3(1)(m)	Item 3(1)(n)
Name	City	State	Country	Country of Citizenship or Incorporation	Describe the provisions of the trust or plan	For individuals Acting in Concert, Identify Name of Individuals or Group Acting in Concert.	For Trusts, Identify each trustee or designated individual that has the power to vote.	Number of Securities - Common Stock	Number of Securities - Warrants	Number of Securities - Options	Number of Securities - Other	Percent of each class of voting securities owned, controlled, or held with power to vote in the holding company	
FDHCPV72	FDHCPV73	FDHCPV74	FDHCPV75	FDHCPV76	FDHCPV77	FDHCPV78	FDHCPV79	FDHCPV80	FDHCPV81	FDHCPV82	FDHCPV83	FDHCPV84	FDHCPV85
Waverly Dorsey	New York	NY	USA	USA	N/A	N/A	N/A	75.00	-	-	-	-	8%
Katalina Daniels	Pittsburgh	PA	USA	USA	N/A	N/A	N/A	16.67	16.67	16.67	-	-	5%
Cherry Trust	Philadelphia	PA	USA	USA	Trustee votes shares owned by the trust upon vote of shareholders.	N/A	Archie Mueller	50.00	-	-	-	-	5.00%
Emerson Brennan	Frankfurt	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Myla Chavez	Dusseldorf	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Helena Pitts	Berlin	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Elianna Grant	Cologne	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Scout Weeks	Munich	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Nyomi Bauer	Hamburg	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Sage Bishop	Leam	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Adalynn Stevenson	Stuttgart	N/A	Germany	Germany	N/A	Brennan Family	N/A	6.25	-	-	-	-	0.63%
Armstrong	Anaheim	CA	USA	USA	N/A	N/A	N/A	50.00	-	-	-	-	5%
Testamentary Trust													

Here is an example of a completed Report Item 3(1). Note that not every Item, or column, will apply to every securities holder. For example, the first entry in row 7 is for an individual securities holder, Waverly Dorsey. Since Waverly is an individual person, Item 3(1)(f) in column F (Describe the provision of the trust/plan), Item 3(1)(g) in column G (For individuals acting in concert), and Item 3(1)(h) in column H (the trustee of the trust) do not apply. Also, Items 3(1)(i), 3(1)(j), 3(1)(k), and 3(1)(l) may or *may* not apply depending on the ownership type of each securities holder.

Row 9, for the Cherry Trust, is an example of a trust that meets the definition of “company” in Regulation Y, and row 18 for the Armstrong Testamentary Trust is an example of a trust that does *not* meet the Regulation Y definition of “company.”

Rows 10-17 are an example of a family or other individuals acting in concert. Note that *all* group members *must* be listed if the group, as a whole, meets the 5% threshold, even if individuals in the group own, control, or have the power to vote *less* than 5%.

Finally, if your organization has more than one holding company, create additional tabs at the bottom for each holding company. Be sure to add the correct holding company name to cell A1 in each tab. Do *not* list the securities holders for multiple

holding companies in the same tab.

Report Item 3(2) Example

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Legal Name of Holding Company: Fakename Bancorp, Inc.												
2	FDHCPV71												
3													
4	Item 3(2)(a) Name	Item 3(2)(b) City	Item 3(2)(c) State	Item 3(2)(d) Country	Item 3(2)(e) Country of Citizenship or Incorporation	Item 3(2)(f) Describe the provisions of the trust or plan	Item 3(2)(g) For individuals Acting in Concert, Identify Name of Individuals or Group Acting in Concert.	Item 3(2)(h) For Trusts, identify each trustee or designated individual that has the power to vote	Item 3(2)(i) Number of Securities Common Stock	Item 3(2)(j) Number of Securities - Warrants	Item 3(2)(k) Number of Securities - Options	Item 3(2)(l) Number of Securities - Other	Item 3(2)(m) Percent of each class of voting securities owned, controlled, or held with power to vote in the holding company
5													
6	FDHCPV85	FDHCPV86	FDHCPV87	FDHCPV88	FDHCPV89	FDHCPV90	FDHCPV91	FDHCPV92	FDHCPV93	FDHCPV94	FDHCPV95	FDHCPV96	FDHCPV97
7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
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Here is an example of Item 3(2). If there were no securities holders that owned, controlled, or had the power to vote 5% or more at any time during the fiscal year but not at fiscal year-end, then type "N/A" in each column. Do not delete this tab.

Report Item 3 (Securities Holders) Anti-Example

Item 3(1)(a)	Item 3(1)(b)	Item 3(1)(c)	Item 3(1)(d)	Item 3(1)(e)	Item 3(1)(f)	Item 3(1)(g)	Item 3(1)(h)	Item 3(1)(i)	Item 3(1)(j)	Item 3(1)(k)	Item 3(1)(l)	Item 3(1)(m)
Name	City	State	Country	Country of Citizenship or Incorporation	Describe the provisions of the trust or plan	For individuals Acting in Concert, Identify Name of Individual or Group Acting in Concert	For trusts, Identify each trustee or designated individual that has the power to	Number of Securities - Common Stock	Number of Securities - Warrants	Number of Securities - Options	Number of Securities - Other	Percent of each class of voting securities owned, controlled, or held with power to vote in the
Legal Name of Holding Company: Fakename Bancorp Inc.												
FDHCPV71												
Waverly Dorsey	New York	NY	USA	USA				75.00				8%
Katalina Daniels	Pittsburgh	PA	USA	USA				16.67	16.67	16.67		5%
Cherry Trust	Philadelphia	PA	USA	USA	Trustee votes shares owned by the trust upon vote of shareholders		Archie Mueller	50.00				5.00%
Emerson Brennan, Mita Chavez, Helena Pittz, Ekanna Grant, Sosou Wankel, Nyomi Bawer, Sage Bishop, Adalynn Stevenson, Armstrong Testamentary Trust												
Frankfurt	N/A	N/A	Germany	Germany	N/A	Brennan Family	N/A					0.63%
Legal Name of Holding Company: Fakename Bancshares												
FDHCPV71												
Waverly Dorsey	New York	NY	USA	USA				75.00				8%
Katalina Daniels	Pittsburgh	PA	USA	USA				16.67	16.67	16.67		5%
Cherry Trust	Philadelphia	PA	USA	USA			Archie Mueller	50.00				5.00%
Emerson Brennan, Mita Chavez, Helena Pittz, Ekanna Grant, Sosou Wankel, Nyomi Bawer, Sage Bishop, Adalynn Stevenson, Armstrong Testamentary Trust												
Frankfurt	N/A	N/A	Germany	Germany		Brennan Family	N/A	6.25				0.63%
Armstrong Testamentary Trust												
Anaheim	CA	USA	USA	USA		N/A	N/A	50.00				5%

Write N/A rather than leaving fields blank

List each security holder separately (even those acting in concert!)

Use a new tab for any mid-tier HCs

Now that you have seen the correct way to fill out Report Item 3, I'm going to highlight some common mistakes that could be made. Each of these mistakes would result in us asking for a revision, so avoiding these mistakes is critical for reducing the burden of revising. The red boxes indicate a mistake, while the blue boxes describe what you can do to fix the issue. We begin with Report Item 3, where we see several issues in the first tab.

Firstly, some Items for Waverly Dorsey and Katalina Daniels are blank. When an Item is left blank, we cannot tell if it was deemed not applicable to an individual, or if the Reporter accidentally skipped over this Item when filling out the Report. Instead of leaving Items blank, please type "N/A" when something does not apply.

Secondly, members of the Brennan Family, who are acting in concert, were all included in one row. Each individual, regardless of whether they are part of a group acting in concert, *must* be listed separately with (if applicable) the group's name identified in Item 3(1)(g).

Lastly, this Reporter included Report Item 3(1) for both their top-tier *and* mid-tier holding companies in one tab, one on top of the other. This is incorrect. Please create a new tab for each holding company, to ensure that the Report Items for

each HC are separated appropriately.

Report Item 3 (Securities Holders) Anti-Example

1	Legal Name of Holding Company: Fakename Bancorp Inc.												
2	FDHCPV71												
3													
4	Item 3(2)(a)	Item 3(2)(b)	Item 3(2)(c)	Item 3(2)(d)	Item 3(2)(e)	Item 3(2)(f)	Item 3(2)(g)	Item 3(2)(h)	Item 3(2)(i)	Item 3(2)(j)	Item 3(2)(k)	Item 3(2)(l)	Item 3(2)(m)
5	Name	City	State	Country	Country of Citizenship or Incorporation	Describe the provisions of the trust or plan	For Individuals Acting in Concert, Identify Name of Individuals or Group Acting in Concert.	For Trusts, Identify each trustee or designated individual that has the power to vote	Number of Securities - Common Stock	Number of Securities - Warrants	Number of Securities - Options	Number of Securities - Other	Percent of each class of voting securities owned, controlled, or held with power to vote in the holding company
6	FDHCPV85	FDHCPV86	FDHCPV87	FDHCPV88	FDHCPV89	FDHCPV90	FDHCPV91	FDHCPV92	FDHCPV93	FDHCPV94	FDHCPV95	FDHCPV96	FDHCPV97
7													
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Write N/A on all columns rather than leaving fields blank

For Report Item 3(2), if you leave everything blank, we cannot tell if you forgot to fill these Items or if they don't apply. If there were no securities holders that owned, controlled, or had the power to vote 5% or more at any time during the fiscal year but not at fiscal year-end, then type "N/A" in each column. Do not delete this tab or leave it blank.

Report Item 4 (Insiders)

If changes occurred to your Insiders, **you must use the new templates.**

1	Legal Name of Holding Company						
2	FDHCPV99						
3							
4	Item 4(1)(a)	Item 4(2)(a)	Item 4(2)(b)	Item 4(3)	Item 4(5)(a)	Item 4(2)(b)	
	Name	State	Country	Principal Occupation if other than with holding company	Title or Position with the Holding Company	Percentage of each class of voting securities owned, controlled, or held with power to vote in the holding company including options, warrants or other securities or rights that can be converted into or exercised for voting securities	
5	FDHCPV99	FDHCPW00	FDHCPW01	FDHCPW02	FDHCPW03	FDHCPW04	FDHCPW05
6							
7							
8							
9							
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This is the Report Item 4 Microsoft Excel template for *Structure Central* submissions. As previously mentioned, if submitting a *hard copy* FR Y-6, you must use the new template on the new Report form.

Note that the Structure Central template for Report Item 4 contains 3 tabs (or sheets) at the bottom. All 3 must be completed. Remember to add the name of your holding company to the top of each tab.

Report Item 4 (Insiders) Example

1	Legal Name of Holding Company: Fakename Bancorp, Inc.						
2	FDHCPV98						
3							
4	Item 4(1)(a)	Item 4(1)(b)	Item 4(1)(c)	Item 4(1)(d)	Item 4(2)	Item 4(3)(a)	Item 4(3)(b)
5	Name	City	State	Country	Principal Occupation if other than with holding company	Title or Position with the Holding Company	Percentage of each class of voting securities owned, controlled, or held with power to vote in the holding company (including options, warrants or other securities or rights that can be converted into or exercised for voting
6	FDHCPV99	FDHCPW00	FDHCPW01	FDHCPW02	FDHCPW03	FDHCPW04	FDHCPW05
7	Tia Kemp	Anahaim	CA	USA	Actor	Chair	5.00%
8	Ronan Cook	Orlando	FL	USA	N/A	Chief Executive Officer	0.00%
9	Celine Santos	Tokyo	N/A	Japan	Environmentalist	Director	2.50%
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Here is an example of a completed Report Item 4 in Structure Central. Note that if the person, group, or company is not a principal securities holder, director, trustee, partner, executive officer, or person exercising similar functions *at the holding company*, they are *not* considered an insider and should *not* be included in Report Item 4. In other words, Item 4(3)(a) in column F (Title/position with holding company) must apply to every insider.

Also, if your organization has more than one holding company, create additional tabs for each one at the bottom. Be sure to add the correct holding company name to cell A1 in each tab. Do *not* list the insiders for multiple holding companies in the same tab.

Report Item 4 (Insiders) Example

	A	B	C	D
1	Legal Name of Holding Company: Fakename Bancorp Inc.			
2	FDHCPV98			
3				
4	Item 4(1)(a)	Item 4(4)(a)	Item 4(4)(b)	Item 4(4)(c)
	Name	Title or Position with direct and indirect subsidiaries	Name of direct and indirect subsidiaries in which Insider has a title or position or ownership in	Percentage of each class of voting securities owned, controlled, or held with power to vote in subsidiaries of the holding company (including options, warrants or other securities or rights that can be converted into or exercised for voting securities)
5				
6	FDHCPV99	FDHCPW06	FDHCPW07	FDHCPW08
7	Tia Kemp	Chair	Bank of Fakename	0%
8	Ronan Cook	Chief Financial Officer	Fakename Enterprises	1%
9	Ronan Cook	Director	Bank of Fakename	0%
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Here is an example of the second of the three tabs for the Structure Central, Microsoft Excel version of Report Item 4, which is concerned with direct and indirect subsidiaries of the holding company. Note that Celine Santos, who was listed in the first tab, is not listed here. If an insider listed in the first tab does not have a title/position with and/or own any part of any subsidiary, then the insider does not need to be listed in the second tab.

Also note that Ronan Cook is listed twice. This is because he has a title/position with more than one subsidiary. Whenever this is the case, the insider should be listed in separate data rows for each subsidiary. Do *not* list more than one title/position or subsidiary in the same cell.

Report Item 4 (Insiders) Example

	A	B	C	D
1	Legal Name of Holding Company: Fakename Bancorp Inc.			
2	FDHCPV98			
3				
4	Item 4(1)(a)	Item 4(5)(a)	Item 4(5)(b)	Item 4(5)(c)
	Name	Title or Position with any other company in which the person is a director, trustee, partner, or executive officer.	Name of any other company in which the person is a director, trustee, partner, or executive officer, or owns, controls, or holds with power to vote 25% or more of its outstanding voting securities or proportionate in a partnership.	Percentage of each class of voting securities owned, controlled, or held with power to vote in any other company (including options, warrants or other securities or rights that can be converted into or exercised for voting securities), or proportionate interest held in a partnership, if 25% or more
5				
6	FDHCPV99	FDHCPW09	FDHCPW10	FDHCPW11
7	Tia Kemp	N/A	Yahya Company	25%
8	Tia Kemp	Chief Financial Officer	Dhruv, Inc.	N/A
9	Tia Kemp	N/A	Booth Corp.	33%
10	Celine Santos	Chief Executive Officer	Blackburn Industries	N/A
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Here is an example of the third of the three tabs of the Structure Central, Microsoft Excel version of Report Item 4, which is concerned with unaffiliated companies. Note that Ronan Cook, who was listed in the first two tabs, is not listed here. If an insider listed in the first tab is not a director, trustee, partner, or executive officer with, and/or does not own 25% or more of, any unaffiliated companies, then the insider does not need to be listed in the third tab.

Also note that Tia Kemp is listed three times. This is because Tia is the CFO of Dhruv Inc. and owns 25% or more of Yahya Co. and Booth Corp. Whenever this is the case, the insider should be listed in separate data rows for each unaffiliated company. Do *not* list more than one company or title/position in the same cell.

Finally, note the “N/As” in Item 4(5)(a) in column B and Item 4(5)(c) in column D. If a person is not a director, trustee, partner, or executive officer with an unaffiliated company but owns 25% or more of it, then the title/position should be marked “N/A,” but the company name and percent ownership should still be provided. Also, if the person is a director, trustee, partner, or executive officer of an unaffiliated company but does *not* own 25% or more of it, then the title/position and company name must be listed but the percent ownership should be marked “N/A.”

Report Item 4 (Insiders) Anti-Example

Item 4(1)(a)	Item 4(1)(b)	Item 4(1)(c)	Item 4(1)(d)	Item 4(2)	Item 4(3)(a)	Item 4(3)(b)
Name	City	State	Country	Principal Occupation if other than with holding company	Title or Position with the Holding Company	Percentage of each class of voting securities owned, controlled, or held with power to vote in the holding company (including options, warrants or other securities or rights that can be converted into or exercised for voting securities)
FDHCPV99	FDHCPW00	FDHCPW01	FDHCPW02	FDHCPW03	FDHCPW04	FDHCPW05
Tia Kemp	Anaheim	CA	USA	Actor	Chair	5.00%
Ronan Cook	Orlando	FL	USA	N/A	Chief Executive Officer	
Celine Santos	Tokyo	N/A	Japan	Environmentalist	Director	2.50%
Jenson Hogan	New York City	NY	USA	Law Enforcement	Director of NameFake Inc.	0.00%

Item 4(1)(a)	Item 4(1)(b)	Item 4(1)(c)	Item 4(1)(d)
Name	Title or Position with direct and indirect subsidiaries	Name of direct and indirect subsidiaries in which Insider has a title or position or ownership in	Percentage of each class of voting securities owned, controlled, or held with power to vote in subsidiaries of the holding company (including options, warrants or other securities or rights that can be converted into or exercised for voting securities)
FDHCPV99	FDHCPW06	FDHCPW07	FDHCPW08
Tia Kemp	Chair	Bank of Fakename	0%
Ronan Cook	Chief Financial Officer	Fakename Enterprises	1%
Ronan Cook	Director	Bank of Fakename	0%

Write 0% - don't leave securities fields blank

Only list insiders for the relevant holding company

Use separate tabs for identifying insiders, roles & shares of subsidiaries, and roles & shares of other businesses. **Do not combine these report items into one tab for each holding company.**

The next three slides will cover some potential mistakes that could be made in Report Item 4.

Starting with the first tab, we can see that Item 4(3)(b) in column G for Ronan Cook is blank. We know from a previous slide that he holds 0% of each class of voting securities, so this field should read 0%.

Looking down, we see Jenson Hogan is listed, but the title/position listed in Item 4(3)(a) in column F is not with the holding company associated with this tab, Fakename Bancorp Inc. Instead, it's with NameFake Inc. Because he is not a principal securities holder, director, trustee, partner, executive officer, or person exercising similar functions at *Fakename Bancorp Inc.*, he should *not* be included in Report Item 4 for Fakename Bancorp Inc. and instead should be removed.

Finally, we see that this Reporter combined the three Microsoft Excel worksheet tabs into a single tab for both holding companies. This is incorrect. Instead, the Reporter should have duplicated each of the three original tabs. After duplicating, the Reporter should fill out three tabs for the top tier holding company and three *separate* tabs for the mid-tier holding company. This keeps the Report Items, and the holding company that each Report Item pertains to, separated.

Report Item 4 (Insiders) Anti-Example

	A	B	C	D
1	Legal Name of Holding Company:		Be sure to write the HC name	
2	FDHCPV98			
3				
4	Item 4(1)(a) Name	Item 4(4)(a) Title or Position with direct and indirect subsidiaries	Item 4(4)(b) Name of direct and indirect subsidiaries in which Insider has a title or position or ownership in	Item 4(4)(c) Percentage of each class of voting securities owned, controlled, or held with power to vote in subsidiaries of the holding company (including options, warrants or other securities or rights that can be converted into or exercised for voting securities)
5				
6	FDHCPV99	FDHCPW06	FDHCPW07	FDHCPW08
7	Tia Kemp	Chair	Bank of Fakename	0%
8	Ronan Cook	Chief Financial Officer, Director	Fakename Enterprises, Bank of Fakename	1%, 0%

Use a new row for each different position an insider has

Looking at tab two, we can see that the Reporter forgot to put the legal name of the holding company in cell A1. This means we don't know which holding company this information applies to. Remember to fill in the name on each tab or you will be required to revise your Report.

Additionally, Ronan Cook holds positions with two subsidiaries but is only listed once. He should be listed twice, with one row describing his role in one subsidiary, and the second row describing his role in the other subsidiary. Keep in mind, if he had two positions with the same subsidiary, he would still need to be listed twice, but the only information that would differ between the two data rows is the title/position.

Report Item 4 (Insiders) Anti-Example

	A	B	C	D
1	Legal Name of Holding Company: Fakename Bancorp Inc.			
2	FDHCPV98			
3				
4	Item 4(1)(a)	Item 4(5)(a)		Item 4(5)(c)
	Name	Title or Position with any other company in which the person is a director, trustee, partner, or executive officer	Company in which the person is a director, trustee, partner, or executive officer, or a company in which the person has a significant ownership interest, or a company in which the person has a significant ownership interest with power to vote 25% or more of its outstanding voting securities or proportionate in a partnership.	Percentage of each class of voting securities owned, controlled, or held with power to vote in any other company (including options, warrants or other securities or rights that can be converted into or exercised for voting securities), or proportionate interest held in a partnership, if 25% or more
5				
6	FDHCPV99	FDHCPW09	FDHCPW10	FDHCPW11
7	Tia Kemp	N/A, Chief Financial Officer, N/A	Yahya Company, Dhruv, Inc., Booth Corp.	25%, N/A, 33%
8	Celine Santos	Chief Executive Officer	Fakename Bancshares	N/A

Use a new row for each different position an insider has

Only include positions with other, non-subsidiary companies on this tab

For tab three, Tia Kemp holds positions in several unaffiliated businesses but is only listed once. She will need to be listed in three data rows in this Report Item, and each row will pertain to a different title/position and company.

Finally, Celine Santos is listed in this tab for her role in Fakename Bancshares. However, this tab is only for companies that are unaffiliated with the holding company and its subsidiaries. She should only be listed here if she had a role in an unaffiliated company. Therefore, she should be removed.

Additional Tips to Avoid Revisions

- Cover Page
 - Title(s) of the signatory on the cover page must match title/position(s) with the HC in Report Item 4.
 - Signatory must be both a director **and** an executive officer of the holding company, **or** the board chair.
 - For top-tier HCs that are trusts or employee stock ownership plans, a trustee must sign the Report.
 - URL on the cover page must be for the holding company (or "N/A"), not the bank.
- Report Items 3 & 4
 - City and state for every Securities Holder and Insider must be for each individual listed, not the HC.
 - Principal securities holders must be listed in both Report Items 3 and 4.
 - Insiders who own, control, or have power to vote 5% or more of the HC must also be in Report Item 3.
 - If minors are Securities Holders or Insiders, do not list the minor's name. Instead, type "Minor Child."
- Generally
 - No fields should be left blank. If a field does not apply, please write "N/A" instead of leaving it blank.
 - Do not include individuals' street addresses, birthdates, or social security numbers.

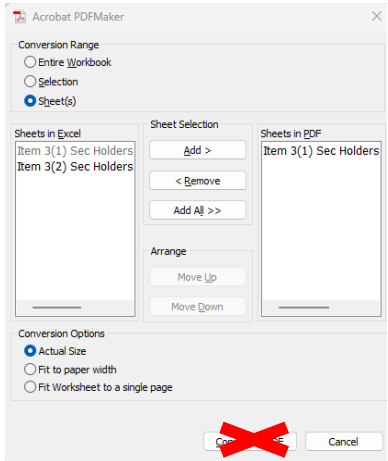
Here are some other Reporting errors to avoid. These are issues that will result in the need for revisions. Keep these in mind as you finalize your FR Y-6.

- Ensure that the title(s) of the Report signatory match their title(s) with the holding company you included in Report Item 4 (Insiders).
- Ensure that the signatory is both a director and executive officer of the top-tier holding company *or* its board chair. If your top tier holding company is a trust or ESOP, then a trustee must sign the Report.
- The URL on the Cover Page must be that of the holding company, not the bank or another subsidiary. If you don't have a URL for the holding company, then type N/A rather than leave it blank.
- For every Securities Holder and Insider listed in Report Items 3 and 4, be sure to provide the city and state (or city and country if foreign) in which they reside, not the city and state of the holding company or bank.
- Principal securities holders (those that directly or indirectly own, control, or have the power to vote 10% or more of the holding company) must be listed in *both* Report Items 3 *and* 4.
- If minors are securities holders or insiders, do *not* provide the minors' names. Instead, type "Minor Child" for the name.
- Type "N/A" instead of leaving any Items blank.

- The FR Y-6 is a public Report. As such, do *not* include individuals' street addresses, birthdates, or Social Security numbers.

Report Items 3 & 4 (Securities Holders & Insiders)

Do not convert the templates into PDF



Do not upload any pdf for Items 3 & 4

If there were changes, respondents must submit an updated Item 3 Securities Holders, utilizing one of the standard templates below.

Select downloadable standard template: [XLSX](#) [XML](#)

Attachments

Choose a file to upload or drag a file here. ~~PDF~~ .xlsx, .xml

No files currently selected

If there were changes, respondents must submit an updated Item 4 Insiders, utilizing one of the standard templates below.

Select downloadable standard template: [XLSX](#) [XML](#)

Attachments

Choose a file to upload or drag a file here. ~~PDF~~ .xlsx, .xml

No files currently selected

In addition, if your institution had changes to Report Items 3 & 4 and you need to complete the new templates in Structure Central, do *not* convert the templates to PDF format. Structure Central *may* indicate that PDF format is acceptable for Items 3 and 4, but please leave your file(s) in either Microsoft Excel (XLSX) or XML format. PDF format is *only* acceptable for Report Item 1 – Annual Report to Shareholders (if applicable) and changes to subsidiaries that are FR Y-6 Reportable but *not* FR Y-10 Reportable (if applicable).

Report Items 3 & 4 (Securities Holders & Insiders)

If there were any changes to Item 3, it is required to file the entire Item. This also applies to Item 4.

7 Securities Holders

Were there any changes to Item 3 Securities Holders from the prior year?

No Yes

8 Insiders

Were there any changes to Item 4 Insiders from the prior year?

No Yes

Also note that if any changes occurred to your securities holders and/or insiders, you *must* provide the *entire* list of Reportable securities holders and/or insiders as of your most recent fiscal year-end date. Do *not* only provide the specific changes.

FR Y-6 Submission

Upon successful submission of your FR Y-6, you will receive a prompt at the top of the page that indicates the following:

- Successful submission.
- Reminders to print and manually sign a copy that must be kept for your records.
 - Per the FR Y-6 Instructions, Reporters must maintain in their files a physical copy of the manually signed FR Y-6 Report cover page for a period of three years following submission.

Success: Your FR Y-6 Report for 12/31/2024 has been created and submitted from Active Report.

Reporters are reminded that Gerardo McKinney must review and manually sign the report.

Per FR Y-6 instructions, Reporters must maintain in their files a physical copy of the manually signed FR Y-6 cover page for a period of three years following submission.

Finally, when you click on “Submit” in Structure Central, you will receive either an error message or a “Success” message. If you receive an error message, review the Item(s) in question and correct the error(s). Once you receive the “Success” message, it will remind you to keep a physically signed FR Y-6 cover page in your records for three years. This is required per the FR Y-6 Report instructions, as it may be requested by our examiners to ensure your compliance with regulatory Reporting requirements, so do not forget to complete this final step.

Resources

Using Structure Central to Complete the FR Y-6

Our Website

<https://www.philadelphiafed.org/banking/organizational-structure>

Annual Report of Holding Companies (FR Y-6)

The *Annual Report of Holding Companies* (FR Y-6) must be filed by all top-tier holding companies annually. It requires that reporters not registered with the SEC submit a copy of an annual report to shareholders (if one is created). The report also must include an organizational chart and an annual verification of domestic branches, as well as information on the identity, percent ownership, and business interests of principal shareholders, directors, and executive officers.

- [FR Y-6 Annual Transmittal Letter](#) (Updated January 2025)
- [Updates to the FR Y-6 Preparation and Submission Process](#) (Added July 2024)
- [FR Y-6 Reporting Forms and Instructions](#)
- Video: [Submitting the FR Y-6 in Structure Central](#) (Updated January 2025)
- [FR Y-6 Report Preparation Video](#) (Updated January 2024)

Annual Report of Foreign Banking Organizations (FD Y-7)

If you are in need of a refresher or additional resources, visit our website. The URL is provided at the top of this slide. There, you will find links to the annual letter we sent last month, the new FR Y-6 Report form and instructions, the short, step-by-step Structure Central submission video, and more. In the coming weeks, we will also post links to the Ask the Fed session from February 5 and this session. Our website also contains useful resources for the FR Y-7 and FR Y-10.

Structure Central Resources Page

<https://www.frbservices.org/resources/central-bank/structure-central.html>

Structure Central Resources

This section offers information on application setup, reports available via the Structure Central application and resources that include user guides, frequently asked questions and contact information.

Setting Up Structure Central access via the FedLine Web® Solution

For information on the steps you need to complete to set up access to Structure Central, visit the [Reporting Central and Structure Central Applications Setup page](#).

NOTE: We strongly encourage you to take advantage of the benefits of electronic submission for all applicable reports. When using the FedLine® Solutions, your organization is obligated to comply with the terms and conditions of Operating Circular 5 and the Certification Practice Statement.

The link below provides more information about this conversion effort:

- [Structure Central Application Frequently Asked Questions](#)

Reports available via Structure Central

The reports currently available via Structure Central are the FR Y-6 Annual Report of Holding Companies and FR Y-7 Annual Report of Foreign Banking Organizations.

Training Details

A Structure Central External User Guide (PDF) is for the benefit of individuals responsible for the preparation and submission of reports. The user guide provides information on how to:

- Log into the application using your Federal Reserve Bank issued physical token
- Navigate through the screens of the application to submit files electronically
- Direct data entry into the application

User Guides explain how to provide the required file formats for submitting reports via Structure Central, demonstrate how a reporting organization can create the file from a spreadsheet or XML schema and information to assist reporting organizations in resolving problems they might have when submitting.

Reports and Forms

The Structure Central Resources page on FRBServices.org contains instructions for obtaining access to Structure Central, frequently asked questions about Structure Central, the Structure Central User Guide (which we encourage you to review), and contact information for technical support.

Contacting Reserve Bank Analysts

- You may need to reach out to a Reserve Bank Analyst if information in Structure Central does not match your organization structure, or if you have questions related to filing your FR Y-6 Report.
- When calling or emailing your Reserve Bank Analyst, please provide the following information:
 - The organization that your question pertains to
 - Specifics on any incorrect information in Structure Central
 - Details about any corrections that must be made to ensure Reporting accuracy
 - If possible, screenshots of any issues encountered within Structure Central

Federal Reserve Bank of Philadelphia
FR Y-6 Analysts
 Statistics, 5 SW / Ten Independence Mall
 Philadelphia, PA 19106-1574

Mike Frank
 215-574-3450
mike.frank@phil.frb.org

John Opalack
 215-574-6159
John.Opalack@phil.frb.org

Michael Zhang
 215-574-4119
Michael.X.Zhang@phil.frb.org

Izzi Childers
 215-574-3717
izzi.childers@phil.frb.org

Another resource at your disposal is our team of Structure Analysts in Philadelphia. We are available to answer any questions you may have, whether they be about:

- Structure Central
- FR Y-10 Online
- FR Y-6, FR Y-7, and/or FR Y-10 Reporting requirements
- Discrepancies in your organizational structure
- Anything else related to your organizational structure

Please do not hesitate to call or email a Structure Analyst anytime about anything. We would rather answer your questions before you submit your Reports than bother you with time consuming revision requests. Our contact information is listed on this slide. We're here to help!

When you reach out, please include the name and/or RSSD ID of your top-tier holding company and as many details as possible so we can assist in a timely and efficient fashion. Sending screenshots is always helpful.

Q & A

- 1. Do we still need to go to the Branch Verification website to review our branches?** No, that site is still active for fiscal years that ended *before* 12/31/24, but it should *not* be used for fiscal years that ended *on or after* 12/31/24.
- 2. Do I still need to email my Domestic Branch Listing to you?** No, you only need to view the Listing in Structure Central and contact us if you identify discrepancies.
- 3. Can I still submit my FR Y-6 in Reporting Central?** No, you must use Structure Central.
- 4. Should we use the Securities Holders and Insiders templates from the new Report form for submission through Structure Central?** No, use the templates in Structure Central for Structure Central submissions. The Report form is only for hard copy submissions.
- 5. Can I still use the format I used to use for the Securities Holders and Insiders lists?** No, the new templates are required for both hard copy *and* Structure Central submissions.
- 6. Do I need to convert the Report Items 3 and 4 templates to PDF before uploading to Structure Central?** No, please leave them in Excel or XML format.
- 7. If the securities holders themselves did not change, but their share count**

- changed, do we need to mark that section as needs updating? Yes, change in number of shares is considered a change.
8. **In the past, if an insider had less than 1% of shares, we simply stated, “Less than 1%.” Do we need to record the actual percentage of shares if less than 1%?** You should provide the exact percentage.
 9. **On the cover page regarding the holding company website, would we need to complete if we have a website for the bank with a link for investor relations for our holding company?** Yes, please provide the exact URL/web address to the holding company information/page rather than the URL to the home page of the bank’s website.
 10. **Can you show the website where we go to access Structure Central?**
<https://www.frb services.org/sign-in/structure-central.html>
 11. **If I list an insider in Item 4, do they go into all three Item 4 tabs even if they do not have any ownership in other companies?** No, if an insider does not have any titles/positions or ownership in subsidiaries and/or unaffiliated companies, then the insider does not need to be included in those tabs.
 12. **Can we use Structure Central as a site to draft the FR Y-6 and then save the draft prior to filing?** Yes, you can save your FR Y-6 as a draft at any point throughout the Report creation process. Just click the Save As Draft button at the top-right corner of the Structure Central screen.
 13. **Is there a way to create a draft of the FR Y-6 to have our clients review before we submit it?** Yes, this can be accomplished in one of two ways. The easiest way is for one or more individuals in your client’s organization to have their own Structure Central user accounts. Then, once you create the Report and save it as a draft, your client can log in with their own user account(s) to view the draft prior to you submitting it. Another way to accomplish this is to send your client the auto-generated Report PDF you can view (and save/print) prior to submitting, along with any other files you upload to Structure Central.
 14. **For the FR Y-6 Organization Chart in Structure Central, if an FR Y-10 for an event that occurred during our last fiscal year is filed *after* our fiscal year-end date, will it update the chart in Structure Central?** Yes, once we process your FR Y-10, the FR Y-6 Structure Central organization chart will update. However, it is *not* necessary to wait for the FR Y-10 to be processed before you submit your FR Y-6.
 15. **I created my FR Y-6 in Structure Central and saved the draft but when I open the PDF, I only see the first two pages of the Report form. Should I see the list of securities holders and insiders, too?** Clicking on the “Preview” and “Report PDF” links will only display the first two pages of the completed Report form. The Securities Holders and Insiders files you uploaded during their respective steps will remain separate files.
 16. **How do I request confidential treatment if I submit my FR Y-6 via Structure Central?** First, to even be *considered* for confidential treatment, all requirements as outlined in the section about Confidentiality in the FR Y-6 Report instructions must be met. Note that requesting confidential treatment does not *guarantee*

confidential treatment, as you must clearly demonstrate the specific harm that would result from public disclosure of your FR Y-6 data. As part of the Structure Central submission process, you will be asked if you request confidential treatment for any portion of your FR Y-6. If you answer “Yes,” you will be prompted to upload a letter requesting confidential treatment, which you can do at that time or afterwards. Provided you met all the other requirements, we will review your request and send our determination at a later date.

- 17. If a CPA/law firm prepared our FR Y-6 in the past, can they gain access to Structure Central to input the information so we can just review it and submit?** Yes, provided your institution approves, you may request access for the firm to prepare and even submit your FR Y-6 on your behalf in Structure Central.