



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

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To: All Chief Executive Officers of National Banks and All Examining Personnel

The enclosed booklet, "Conflicts of Interest," is the second in a series of booklets that is being published by the Asset Management Division to eventually replace the *Comptroller's Handbook for Fiduciary Activities*. Future booklets are expected to address such topics as asset management, investment management and advisory services, fiduciary investments, personal financial services, retirement plan services, custody services, fiduciary operations and information systems, and corporate trust and security holder services.

The "Conflicts of Interest" booklet is intended to be used by examiners to evaluate the risk management practices banks have in place to control conflicts of interest and self-dealing. The booklet guides examiners in conducting on-site fiduciary examinations during both large bank and community bank examinations. The booklet's introduction provides an overview of risks and controls associated with conflicts of interest, while the booklet's appendices contain in-depth discussions of certain transactions that may result in conflicts of interest or self-dealing.

If you have questions about this booklet, please call the Asset Management Division at (202) 874-4447. Examiners are encouraged to send e-mail comments and questions to the Asset Management OCCnet discussion boards.

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