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October 14, 2010

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IN P. LAMB\* LANGE J. LEFFELL GREG LIU Y D. MARELL ARVER MASON V. MASOTTI 5. MAYNARD V. MAYO TTH P. LUIZIA SET M M COLM MARK F MENDELSOHN TOBY S. MYERSON JOHN E. NATHAN CATHERINE NYARADY ALEX YOUNGEL JOHN E. NATHAN CATHERINE NYARADY ALEX YOUNGEL MARK F PARKER. MARK F POMERANTZ VALENIE C PARKER. MARK F POMERANTZ VALERIE E RADWANER CARE L F POMERANTZ VALERIE REIGNER WALTER REIGNER WALTER REIGNER WALTER REIGNER NOSEN N ROSENBERG PETER LENNE P ENBERG PETER LENNE P ENBERG PETER LENNE P ENBERG DALE M SARRO JEFFREY D SAMUELS DALE M SARRO STEPHEN J. SHIMEN EIDER SAUDREW SCHUMB STEPHEN J. SHIMEN STEPHEN STEPH H R MCCOLM No. LINE ADEND. V B SAMUELS SARRO E SCHIMEK TTIM SCHINER ALSONABER ALSONABER ALSONABER ALSONABER ALSONABER ALSONABER ALSONA SOBEL TEWART ONE Y THOYER TOAL NDERBERG LAZQUEZ I G. WEE V. WELLS. JR. ILKINSON WILKINSON J WILLIAMS ICE I. WITDORCHIC E. YARETT YOSHINO OBERT ZOCHOWSKI, JR

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### By E-Mail & FedEx

Thomas Borgers **Financial Crisis Inquiry Commission** 1717 Pennsylvania Avenue, NW Suite 800 Washington, DC 20006-4614

Financial Crisis Inquiry Commission ("Commission")

Dear Mr. Borgers:

As you know, we represent Citigroup Inc. ("Citi" or the "Company") in connection with its responses to the Commission's requests for documents and information, including your September 1, 2010 e-mail request (the "September 1 Request") and October 7, 2010 e-mail request (the "October 7 Request").

In response to document request 2 of the September 1 Request, we enclose copies of due diligence summary reports relating to CMLTI 2006-NC2. With respect to the CMLTI 2006-NC2 transaction, Citi performed due diligence both in connection with the securitization and at the time when Citi purchased the underlying whole loans from New Century. The enclosed documents, which bear control numbers CITI-FCIC 112161 through 112176 and CITI-FCIC 122231 through 122232, relate to both phases of due diligence. We have redacted the enclosed documents in the manner that I understand you recently discussed with my colleague Susanna Buergel.

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## Thomas Borgers

In response to the October 7 Request, Citi states that, according to its records, the initial purchasers of the Class A2 certificates associated with the CMLTI 2006-NC2 transaction were as follows:

CUSIP	CLASS	PURCHASER	QUANTITY IN DOLLARS	
17309TAB4	A2-A	State St. Global Advisors (ABS/CMBS Index Fund)	10,170,000	
17309TAB4	A2-A	Chase Security Lendings Asset Management	141,749,000	
17309TAB4	A2-A	Drake Offshore Master Fund Ltd.	15,000,000	
17309TAB4	A2-A	Investment Co. of the People's Republic of China	15,000,000	
17309TAB4	A2-A	State St. Global Advisors	5,595,000	
17309TAB4	A2-A	State St. Bank & Trust	6,100,000	
17309TAB4	A2-A	State St. Global Advisors (Short Term Bond CTF)	8,135,000	
17309TAB4	A2-A	Northern Trust Co.	80,000,000	
17309TAC2	A2-B	Bayerische Landesbank	20,000,000	
17309TAC2	A2-B	Invesco (BellSouth Master Savings Trust)	5,000,000	
17309TAC2	A2-B	UBS Global Asset Management (Dillon Read)	20,000,000	
17309TAC2	A2-B	Deutsche Zentral-Genossenschafts Bank	35,000,000	
17309TAC2	A2-B	Federal Home Loan Bank of Chicago	60,000,000	
17309TAC2	A2-B	Fidelity Management (Ultra Short Bond Fund)	2,000,000	
17309TAC2	A2-B	Fidelity Management (FSEC Corp.)	8,000,000	
17309TAC2	A2-B	Banca Commerciale Italiana	20,000,000	
17309TAC2	A2-B	Invesco	330,000	
17309TAC2	A2-B	Invesco	15,000,000	
17309TAC2	A2-B	Fidelity Management	9,856,000	
17309TAC2	A2-B	Kentucky Retirement Systems	9,200,000	
17309TAC2	A2-B	Invesco	140,000	
17309TAC2	A2-B	Memorial Hospital at Gulfport	120,000	
17309TAC2	A2-B	Société Générale	30,000,000	
17309TAC2	A2-B	Fidelity Management (Ultra Short Central Fund)	27,500,000	
17309TAC2	A2-B	Invesco	110,000	
17309TAC2	A2-B	Ursuline Society & Academy	100,000	
17309TAC2	A2-B	State St. Global Advisors (Limited Duration Bond CTF)	20,000,000	
17309TAD0	A2-C	Hypo Real Estate	9,266,000	
17309TAD0	A2-C	Washington Mutual	9,000,000	

All of the purchases reflected in the foregoing chart occurred on September 12, 2006.

\*

\* \* \* \*

Citi reserves the right to supplement, amend, modify or correct any of the responses provided above.

As we have discussed, the Company is providing the information in this letter in response to the Commission's requests and pursuant to the Commission's representations that the information provided to the Commission will be maintained in

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strict confidence and will be used by the Commission solely for the purposes of this inquiry.

We understand from our discussions that the Commission's work, and the materials it requests and obtains from the Company, are not subject to the provisions of FOIA. We also understand that the Commission intends to keep the materials submitted to it by the Company strictly confidential in connection with this inquiry.

If any person not a member of the Commission or its staff (including, without limitation, any government employee) should request an opportunity to inspect or copy any confidential information provided by the Company, or if you or any member of the Commission or its staff contemplates disclosure of this information to any other person, the Company requests that the Commission promptly notify Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, N.Y., N.Y. 10019 (att'n Brad Karp) and Citigroup Inc., 399 Park Avenue, N.Y., N.Y. 10022 (att'n P.J. Mode).

Please do not hesitate to contact me if you would like to discuss this letter or any other matter.

Respectfully,

Brad S. Karp

Enclosure

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October 14, 2010

NOT ADMITTED TO THE NEW YORK BAR

## By E-Mail & FedEx

Thomas Borgers Financial Crisis Inquiry Commission 1717 Pennsylvania Avenue, NW Suite 800 Washington, DC 20006-4614

Financial Crisis Inquiry Commission ("Commission")

Dear Mr. Borgers:

As you know, we represent Citigroup Inc. ("Citi") in connection with its responses to the Commission's requests for documents and information. We write in response to your October 5, 2010 e-mail requesting certain data related to Citi's exercise of "Put Back Rights" against the various originators and/or sellers from whom Citi purchased mortgage loans.

The following chart reflects the total loan units Citi sought to put back to mortgage originators and/or sellers from January 1, 2007 through September 30, 2010, broken down by year and by the reasons you specified. With respect to the reasons for put back you specified, we note that, prior to 2009, Citi did not have a system for categorizing put backs that reliably selected the primary reason for which loans were being put back. As a result, loans that suffered from multiple defects may be included in the chart below under "All Other Categories," though they may have also suffered from one of the defects specified. Finally, in addition to the total loan units listed, Citi has

Put Back Units	Missing Docs	Origination Guideline Violation	Valuation	Employment / Income	Deposits / Assets	All Other Categories	Total
2007	728	194	92	558	21	2,165	3,758
2008	562	446	205	702	41	1,465	3,421
2009	282	756	322	3,466	73	1,552	6,451
YTD 2010	109	573	555	3,904	96	1,107	6,344
Total	1,681	1,969	1,174	8,630	231	6,289	19,974

entered into certain agreements with sellers that may have the effect of resolving potential future put back claims for certain loans.

For the period January 1, 2007 to September 30, 2010, Citi sought to put back the largest number of loans to the following five entities. For each of those entities, we list the number of loans sought to be put back and the corresponding original loan amount for those loans.

Entity	<b>Total Units</b>	<b>Total Dollar Amount</b>		
	1.505	000 177 (20		
MortgageIT, Inc.	1,586	208,177,639		
Merrill Lynch Mortgage Lending				
Inc.	1,233	274,621,908		
CIT Group/Consumer Finance Inc.	709	81,064,963		
DLJ Mortgage Capital Inc.	616	138,529,398		
IndyMac Bank FSB	604	48,978,169		

\* \* \* \*

Citi reserves the right to supplement, amend, modify or correct the response provided above.

As we have discussed, the Company is providing the information in this letter in response to the Commission's requests and pursuant to the Commission's representations that the information provided to the Commission will be maintained in strict confidence and will be used by the Commission solely for the purposes of this inquiry.

# PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP Thomas Borgers

We understand from our discussions that the Commission's work, and the materials it requests and obtains from the Company, are not subject to the provisions of FOIA. We also understand that the Commission intends to keep the materials submitted to it by the Company strictly confidential in connection with this inquiry.

If any person not a member of the Commission or its staff (including, without limitation, any government employee) should request an opportunity to inspect or copy any confidential information provided by the Company, or if you or any member of the Commission or its staff contemplates disclosure of this information to any other person, the Company requests that the Commission promptly notify Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, N.Y., N.Y. 10019 (att'n Brad Karp) and Citigroup Inc., 399 Park Avenue, N.Y., N.Y. 10022 (att'n P.J. Mode).

Please do not hesitate to contact me if you would like to discuss this letter or any other matter.

Respectfully,

Brad S. Karp

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