

From: Dan D. Graham <dgraham@fbandtbank.com>
Sent: Monday, July 17, 2023 3:32 PM
To: Comments
Subject: [EXTERNAL MESSAGE] May 22, 2023 - Special Assessments Pursuant to Systemic Risk Determination - Notice of Proposed Rulemaking; Comment Request (RIN 3064-AF93)

Mr. James P. Sheesley
Assistant Executive Secretary
Attention: Comments—RIN 3064-AF93
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Mr. Sheesley:

This letter is in reference to the FDIC's proposal to exempt community banks under \$5 billion for the special assessment, and its request for comments on the subject. I'm going to be brief in my comments because I know you have a lot of comment letters to go through, and because the facts of the situation are pretty straight forward.

I am the President & CEO of Flora Bank & Trust, a \$112 million community bank located in southern Illinois. We serve a community of about 5,000 citizens and our bank is primarily engaged in consumer, small business, and residential real estate lending.

Here at Flora Bank & Trust we strongly support the FDIC's proposal to limit special assessments to the large banking organizations, and exempt less risky community banks from paying any special assessments or increase premiums to cover the risks the larger institutions are taking. While the recent bank failures involved institutions with over 90% uninsured deposits our bank has significantly less, and the majority of those have pledging's covering uninsured balances. It simply would not be fair to subject less risky banks like ours serving small communities to higher insurance costs that the citizens we serve will end up paying for.

In short, riskier institutions should pay any special assessments, after all that's how insurance designed to work, isn't it?

Thank you for the opportunity to submit our thoughts, and for avoiding a one-size-fits-all approach to the special assessment, we strongly support the FDIC to finalize its rulemaking as proposed..

Respectfully,

Dan D. Graham
President & CEO
Flora Bank & Trust

