

From: [Kent E. Carruthers](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-AG15
Date: Monday, September 22, 2025 5:58:14 PM

Ms. Jennifer M. Jones
Deputy Executive Secretary
Attention: Comments
RIN 3064-AG15
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Ms. Jones,

I am writing regarding the FDIC's request for comment on its proposal to raise and index asset thresholds regarding Part 363 of the Federal Deposit Insurance Corporation Improvement Act of 1991.

I am the President of The Citizens Bank of Clovis, Clovis, New Mexico a \$517 Million asset Bank at 12-31-2024. At our call for March 31 we totaled \$500.7 Million in assets and at June 30 we were \$496 Million in assets. Due to exceeding the \$500 Million threshold at 12-31-2024 our long serving auditors are no longer able to give us the services we require. This includes providing income tax preparation for myself as the President which has been a benefit provided for many years.

We are a family owned community bank in a rural market that was established in 1916. We provide essential lending services to our community of 36,000 with a surrounding population of 50,000. We are further unique in that as a State Chartered Bank we are only required to have 3 Directors which is what we have. Since 2 of the Directors are stockholders but not in active Management we were approved for them to qualify as independent Directors for an Audit Committee. Due to our circumstances our Board is involved in all Committees of the Bank.

We support the FDIC's proposal to increase the thresholds and indexing. This is long overdue as even our Auditors have expressed frustration that updates to the limits have not been adjusted for decades.

Thank you in advance for considering to modernize outdated thresholds. I hope you will consider other thresholds that have not been adjusted in years.

Sincerely,

Kent Carruthers, President

The Citizens Bank of Clovis

[REDACTED]

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