

**MEMORANDUM**

**TO:** Executive Secretary Section

**RE:** Advance Notice of Proposed Rulemaking Relating to Brokered Deposits and Interest Rate Restrictions

**FROM:** Sheikha Kapoor, Senior Counsel

**DATE:** February 26, 2019

**SUBJECT:** Meeting with Nantahala Bank and Trust Company

---

On February 19, 2019, representatives of Nantahala Bank and Trust Company (the Bank) met with the Federal Deposit Insurance Corporation (FDIC) in response to the FDIC's Advance Notice of Proposed Rulemaking (ANPR) relating to brokered deposits and the interest rate restrictions. The ANPR was published in the Federal Register on February 6, 2019 (84 FR 2366). The Bank's representatives discussed their views on interest rate restrictions.

---

**FDIC:** Jelena McWilliams  
Chad Davis  
Sheikha Kapoor

**Nantahala Bank and Trust:** Tim Hubbs, Nantahala Bank and Trust  
Peter Gwaltney, North Carolina Bankers Association