

**From:** Bruce Pogatchnik <bpogatchnik@fibmn.com>  
**Sent:** Tuesday, July 18, 2023 11:26 AM  
**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:

As a small community bank that isn't in the "Too big to fail category" we feel we should not be asked to pay for losses for uninsured deposits in financial institutions that are TBTF or deemed by the FDIC or Govt as systemically important. If all deposits are to be insured, then the FDIC should make that their policy. If all deposits were insured upfront, it is doubtful that these banks would have experienced a Run and failed.

Let those banks that enjoy TBTF status pay for the losses from that implied guarantee as they receive the benefit.

Sincerely,

Bruce Pogatchnik, CEO  
First Independent Bank  
Russell MN 56169

**Bruce Pogatchnik**  
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