

FEDERAL DEPOSIT INSURANCE CORPORATION

+ + + + +

MEETING OF THE ADVISORY COMMITTEE ON  
COMMUNITY BANKING

+ + + + +

OPEN TO PUBLIC OBSERVATION

+ + + + +

TUESDAY,  
APRIL 13, 2021

+ + + + +

The Board convened at 1:00 p.m. EST via  
Video Teleconference, Jelena McWilliams,  
Chairman, presiding.

PRESENT:

JELENA MCWILLIAMS, Chairman, Federal Deposit  
Insurance Corporation  
MARTIN J. GRUENBERG, Director, Federal  
Deposit Insurance Corporation  
ARLEAS UPTON KEA, Deputy to the Chairman for  
External Affairs  
SHAZA ANDERSON, Member  
MARK PITKIN, Member  
PATTY MONGOLD, Member  
JOHN WHARTON, Member  
KENNTH KELLY, Member  
SARAH GETZLAFF, Member  
NEIL MCCURRY, Member  
ANDREW WEST, Member  
GILBERT NARVAEZ, JR., Member  
BETSY JOHNSON, Member  
STEPHEN HAYES, Member  
MARGARET OLDNER, Member

BRUCE LOWRY, Member  
CINDY KITNER, Member  
MIKE BOCK, Member  
HAROLD HORVAT, Member  
TERI MESSERSCHMITT, Member

ALSO PRESENT:

SHAYNA OLESIUK, Division of Insurance and  
Research  
KRISTIE ELMQUIST, Dallas Region  
FRANK HUGHES, New York Region  
BETTY RUDOLPH, Minority and Community  
Development Banking  
SULTAN MEGHJI, Chief Innovation Officer  
DOREEN EBERLEY, Division of Risk Management  
Supervision  
RAE-ANN MILLER, Division of Risk Management  
Supervision  
JOHN VOGEL, Division of Risk Management  
Supervision  
CHRIS FINNEGAN, Division of Depositor and  
Consumer Protection  
JOHN ANDERLIK, Division of Insurance and  
Research

CONTENTS

Introductory Remarks	
Jelena McWilliams. . . . .	4
Discussion of Local Banking Conditions	
Members of the Advisory Committee. . . . .	10
on Community Banking	
Shayna Olesiuk . . . . .	106
Kristie Elmquist . . . . .	111
Frank Hughes . . . . .	112
Update from the Minority Depository Institutions	
Subcommittee	
Gilbert Narvaez, Jr. . . . .	130
Betty Rudolph. . . . .	128
FdiTech Update	
Sultan Meghji. . . . .	137
Supervision Update	
Doreen Eberley . . . . .	164
Rae-Ann Miller . . . . .	171
John Vogel . . . . .	169
G. Chris Finnegan. . . . .	188
Research Update: FDIC Community Banking Study and	
Agricultural Lending	
John Anderlik. . . . .	213
Closing Remarks	
Jelena McWilliams. . . . .	242

1 P-R-O-C-E-E-D-I-N-G-S

2 (1:04 p.m.)

3 CHAIRMAN MCWILLIAMS: Good afternoon  
4 or good morning, for those of you on the West  
5 Coast. Welcome to this first meeting of 2020 of  
6 the FDIC Advisory Committee, I'm sorry, 2021, of  
7 the FDIC Advisory Committee on Community Banking.  
8 And thank you for making the time today to  
9 participate.

10 A lot has happened since we met last  
11 October. Certainly I hope that you and your  
12 families are doing well, and I appreciate the  
13 time you dedicated to the last meeting and,  
14 again, this meeting as well.

15 At the FDIC, we continue to focus on  
16 core safety and soundness principles, capital  
17 liquidity, and asset quality of our banks. We  
18 are pleased with our COVID response. In 2020 the  
19 bank regulators issued many rulemakings to ensure  
20 banks had the flexibility to support the economy  
21 in their communities.

22 Though we're optimistic about the

1 economic outlook, we will continue to monitor  
2 economic conditions and the state of the banking  
3 industry and assess what is the appropriate  
4 regulatory response as we go forward.

5 One of our primary focuses is to  
6 promote innovation and to create a regulatory  
7 environment that will make it easier for small  
8 banks to adopt new technologies and thrive in a  
9 rapidly changing and evolving environment.

10 We have just hired our first Chief  
11 Innovation Officer to lead FDITech, Sultan  
12 Meghji. You will hear from him today. And we  
13 have already highlighted for you, but we will  
14 continue to talk about the FDITech initiatives.

15 One of them is the rapid prototyping  
16 to replace call reports. And the second one is  
17 the proposal to create a standard setting  
18 organization to establish standards for due  
19 diligence of vendors and for the technologies  
20 they develop.

21 We're also looking at innovation more  
22 holistically and whether or not we need

1 appropriate policy changes to remove barriers to  
2 innovation and how our banks utilize innovation,  
3 as well as we are focused on financial inclusion  
4 that has been frankly exacerbated by the  
5 pandemic, as well as the overall area of American  
6 competitiveness in making sure that our banking  
7 system remains the foremost banking system in the  
8 world.

9 Before we get started on a lot of  
10 these topics, I would like to take a minute to  
11 welcome members of the committee who are here  
12 for their very first meeting.

13 Mike Bock, CEO of Dairy State Bank in  
14 Rice Lake, Wisconsin. Harold Horvat, President,  
15 CEO and Chairman of Centreville Bank in West  
16 Warick, Rhode Island. Betsy Johnson, President  
17 and CEO of Solutions Bank in Forreston, Illinois.  
18 Cindy Kitner, President and CEO of Jefferson  
19 Security Bank in Shepherdstown, West Virginia.  
20 Bruce Lowry, President and CEO of Ireland Bank in  
21 Malad city, Idaho. Neil McCurry, Jr., President  
22 and CEO of Sabal Palm Bank in Sarasota, Florida.

1 Margaret Older, CEO of Stone Bank in Mountain  
2 View, Arkansas. Andrew West, President and CEO  
3 of Eagle Bank in Polson, Montana. And John  
4 Wharton, President and CEO of Yampa Valley Bank  
5 in Steamboat Springs, Colorado.

6 While I wish I could welcome you all  
7 in person, I'm pleased we are having this  
8 important meeting, albeit electronically, and I  
9 look forward to our discussion today.

10 So again, welcome, everybody. I will  
11 now turn the program over to Arleas Upton Kea who  
12 will serve as the moderator the today's meeting.  
13 Thank you.

14 MS. KEA: Thank you so much, Chairman  
15 McWilliams. Before we begin with today's agenda,  
16 let me just ask, Director Gruenberg, do you have  
17 any comments or remarks that you would like to  
18 share with the members before we start?

19 DIRECTOR GRUENBERG: Yes, Arleas,  
20 thank you. Let me just say a word of welcome to  
21 everybody, and thank you for taking the time  
22 today. I very much look forward to the

1 discussion we're going to have.

2 I have to say, as I think back where  
3 we were a year ago, which was in the immediate  
4 aftermath of the pandemic's devastating impact on  
5 the economy, it seems to me we may have feared we  
6 would be in an even more severe situation today,  
7 a year later, than we actually are.

8 And it seems to be a significant  
9 measure that community banks in particular have  
10 come through this period thus far in remarkably  
11 good shape. And you all have served your  
12 communities exceptionally well. And as I said, I  
13 very much look forward to your presentations  
14 today.

15 And even though I think we have good  
16 reason for hopefulness looking forward, there  
17 clearly is still significant uncertainty and, I  
18 think, significant downside risk to the financial  
19 system that we need to be attentive to, most  
20 obviously in the area of commercial real estate  
21 in particular.

22 So I think we have a lot to talk about



1 today. I very much look forward to hearing what  
2 you all are seeing in your local communities and  
3 local markets. And thanks again for taking the  
4 time to participate. Arleas, thank you.

5 MS. KEA: Thank you, Director  
6 Gruenberg.

7 We're going to start this afternoon by  
8 turning to the committee members for an update  
9 about their (Audio interference.) issues related  
10 to banking conditions in their individual  
11 communities.

12 And then after that, we'll hear from  
13 the FDIC staff members as they will share their  
14 observations and touch upon items that likely  
15 will be relevant to the information that the  
16 committee members have shared.

17 Then Shayna Olesiuk, Associate  
18 Director of our National and Regional Risk  
19 Analysis from our Division of Insurance and  
20 Research is going to cover some observations  
21 about the national economy and banking trends.

22 We also have with us today Kristy

1 Elmquist, the FDIC's regional director from our  
2 Dallas region, and then Frank Hughes, the FDIC's  
3 regional director from our New York region, with  
4 us today. And they both will offer some local  
5 observations which we think will also be of  
6 interest to all of you as well.

7 So at this time, I'd like to start our  
8 committee member discussion with Shaza Anderson,,  
9 the chief executive officer of Truststar Bank.  
10 Ms. Anderson will be followed by the other  
11 committee members.

12 Ms. Anderson, you have the camera.

13 MS. ANDERSON: Good afternoon, thank  
14 you so much Arleas. Can you guys hear me?

15 MS. KEA: We can, yes.

16 MS. ANDERSON: Thank you. It's great  
17 to be with you all. And thank you, Madam  
18 Chairman. And I'm really pleased to be leading  
19 the conversation and looking forward to listening  
20 to everybody as well. I hope that everybody has  
21 remained safe and healthy during this time.

22 There is positive momentum in the

1 country in fighting COVID, and in our economic  
2 rebound. The greater Washington market is no  
3 exception. We live in a dynamic market with  
4 three jurisdictions, Virginia, Maryland, and DC,  
5 with each in their own state of readiness.

6 However, commercial office vacancies  
7 remain very high, even though recent transaction  
8 prices have been near or at record highs.

9 Businesses continue to be productive with most  
10 remaining at work from home default. Schools are  
11 reopening, and restaurants and businesses are  
12 beginning to return to fuller levels of activity.

13 Our market is resilient. And having  
14 a workforce and economy anchored with the federal  
15 workforce via technology and services has helped  
16 to maintain some stability. Unemployment is  
17 steadily declining and is now around 5.7 percent.

18 We continue to experience strong  
19 demand for our banking services and are  
20 forecasting strong growth for the fiscal year.  
21 Through Quarter One, our bank has achieved assets  
22 of \$380 million. Remember, we opened a year and

1 a half ago.

2 Since last quarter, we have had  
3 deposit growth of 164 percent and loan growth of  
4 217 percent, excluding PPP. We continue to  
5 process PPP applications, but demand for the  
6 program has slowed. We have also been fortunate  
7 not to have any charge offs during this time or  
8 past dues.

9 I believe I mentioned the last time we  
10 were together that we acquired a mortgage  
11 company. We completed the integration and  
12 recently announced the branding of Truststar  
13 Mortgage. We have also entered the Maryland  
14 market and received our FDIC approval just  
15 recently on March 25th. Thank you, FDIC.

16 We are seeing businesses and offices  
17 reopen while most people continue to work from  
18 home. The economy gets stronger every day with a  
19 confidence that things will continue to improve.  
20 I'm excited about the future and confident in the  
21 days to come.

22 Thank you all so much.

1           MR. PITKIN: So good afternoon, all.  
2           I'm Mark Pitkin, President and CEO of Sugar River  
3           Bank, located in Newport, New Hampshire. We are  
4           a state chartered mutual institution founded in  
5           1895 with six branches spanning from the west  
6           central to the central part of the state.

7           Current assets total \$346 million. We  
8           provide hometown banking, primarily in small town  
9           environments, and our mission is to exceed the  
10          expectation of our customers.

11          While the bank remains vigilant and  
12          focused on strict COVID-19 safety protocols for  
13          both customers and staff, the bank has called  
14          back all remote employees to the office. Working  
15          closely together, sharing ideas, and supporting  
16          each other on a daily basis has been, and will  
17          continue to be, a competitive advantage of the  
18          bank.

19          Of all states, New Hampshire has the  
20          eighth lowest COVID-19 death rate per capita in  
21          the nation. As of April 19th, every Granite  
22          Stater 16 years of age and older is eligible for

1 the vaccine regardless of their residency.

2 New Hampshire ranks first in the  
3 nature with 51 percent of New Hampshire residents  
4 receiving at least one dose. The national  
5 average is 36 percent. Likewise, 22 percent of  
6 residents are fully vaccinated which is also  
7 above the national average of 20 percent.

8 The 2020 housing market was historic  
9 in terms of New Hampshire home sales. While much  
10 like 2019, the difference was the pandemic.  
11 However, the exploding market seemed to defy the  
12 crisis as single family residential unit sales,  
13 median price, and sales volume hit all-time  
14 highs.

15 Sales far outpaced new listings and,  
16 as a result, inventory has hit its lowest point  
17 in at least 16 years. The median price for  
18 single family residential properties in the state  
19 was \$335,000, a 12 percent jump from the previous  
20 high of \$300,000 which came just the year before  
21 in 2019.

22 Overbidding on available inventory is

1 more common than not in this environment. With  
2 continued historically low interest rates and  
3 high demand, the bank's residential mortgage  
4 lending continues to be very strong with near  
5 record level refinance activity.

6 2020 mortgage loan origination volumes  
7 increased a remarkable 86 percent over the volume  
8 in 2019. However, this robust finance activity  
9 has also contributed to the significant decline  
10 in the bank's net interest margin from 3.57  
11 percent at year end, 2019, to 3.19 percent at  
12 year end, 2020.

13 The bank's investments, which also  
14 increased significantly by 31.7 percent year over  
15 year from 2019, has further contributed to the  
16 compressed margin due to decreasing reinvestment  
17 yields.

18 Regarding small business lending, I am  
19 pleased to report Sugar River Bank's remarkable  
20 efforts in assisting local businesses that were  
21 faced with significant financial challenges due  
22 to the pandemic. We have originated \$14.8

1 million in PPP loans to 379 small businesses  
2 saving 1,947 jobs as of March 31st, 2021.

3 As a community bank, no loan request  
4 was too small. Our average loan was \$39,000,  
5 ranging from a high of \$578,000 to as little as  
6 \$256. To date, we have accepted 191 forgiveness  
7 applications representing 5.4 percent of total  
8 PPP loans.

9 On balance sheet liquidity range is  
10 very strong, bolstered primarily by increasing  
11 cash balances with continued strong consumer  
12 saving trends, multiple economic stimulus  
13 payments, and significant loan and investment  
14 cash flows.

15 Cash balances as of March 31st, 2021,  
16 have increased 86 percent since year end 2020 and  
17 an astonishing 200 percent since year end 2019.  
18 The banks total assets have likewise grown by 4.3  
19 percent in the first quarter of 2021 and more  
20 than 12 percent since year end 2019.

21 Despite the substantial asset growth,  
22 Tier One leverage remains strong at 13.7 percent.



1 As a mutual institution, the bank is well poised  
2 to accept continued deposits from our local  
3 communities.

4 With that historically strong capital  
5 position, we ably stand to support future growth.  
6 However, I did receive a call from a local CEO  
7 who was concerned with continued regulatory  
8 flexibility in instances where Tier One leverage  
9 ratios have dropped below nine percent as a  
10 result of the unanticipated pandemic events.

11 Sugar River Bank's asset quality  
12 remains strong. We have not had any borrowers  
13 requesting pandemic related loan modifications or  
14 deferrals since September 2020. Adversely  
15 classified assets to capital, non-performing  
16 assets, and delinquencies remain low.

17 Our allowance for loan and losses  
18 remains more than adequate, ensuring future  
19 coverage of any latent credit losses stemming  
20 from the fallout of the pandemic.

21 Our challenges continue to be managing  
22 a higher than average employee turnover,

1 addressing the ever-increasing complexities and  
2 costs of cybersecurity, and the technological  
3 expectations of consumers, and finding reasonable  
4 reinvestment opportunities for increasing cash  
5 balances.

6 In conclusion, I thank you for  
7 allowing me the opportunity to share what's going  
8 on at Sugar River Bank in our market area and in  
9 the state.

10 MS. MONGOLD: Good morning, for me  
11 it's morning. I know it's afternoon for you on  
12 the East Coast. But I'm Patty Mongold, President  
13 and CEO of Mt. McKinley Bank, a mutual bank in  
14 Fairbanks, Alaska.

15 In 2020 Mt. McKinley Bank saw nearly  
16 19 percent growth in assets. We had a 34 percent  
17 growth in loans and a 21 percent growth in  
18 deposits. Our earnings out performed out budget,  
19 but that was primarily due to a robust mortgage  
20 activity. The mortgage side was the driver for  
21 the majority of our earnings. That (Audio  
22 interference.) 2021, but we do continue to see

1 strong margin compression.

2 For an update on COVID-19, Alaska led  
3 the land and was the state to offer Corona virus  
4 vaccinations to anyone age 16 and older. At  
5 present, 27 percent of all eligible Alaskan's  
6 have been fully vaccinated. However, our alert  
7 level remains high for new cases.

8 The state remains open. We have no  
9 restrictions on business operations and no mask  
10 mandates. Most organizations, however, are still  
11 holding their meetings virtually, or at least  
12 ensuring that social distancing can be  
13 maintained, and masks are being worn, primarily.  
14 Our hospitalization rate and death rate both  
15 remain low, which are all good things.

16 Mt. McKinley Bank made 385 first round  
17 PPP loans for about \$39 million. At year end,  
18 297 of those loans in the total amount \$32  
19 million were still outstanding.

20 The SBA forgiveness process remains  
21 slow, but it has improved quite a bit over the  
22 last few weeks. We have processed another 185

1 second round PPP loans for about \$18 million.  
2 That's through March 2021. And we have several  
3 more sitting in our pipeline.

4 We're closely monitoring our non-owner  
5 occupied commercial real estate loans, as we  
6 believe that this is an area of risk to the bank.  
7 But at present, our non-owner occupied commercial  
8 real estate portfolio has load delinquencies.  
9 The values are holding are holding steady and the  
10 cap rates are also holding steady. But we have  
11 adjusted our allowance for loan and lease losses  
12 to account for what we perceive to be an  
13 increased risk in that portfolio.

14 The Alaskan economy is still showing  
15 the effects of the pandemic. Recently reported  
16 trends indicate the unemployment for the state is  
17 up 7.1 percent when you compare February 2021 to  
18 February of 2020.

19 Crude oil prices, which drive much of  
20 the Alaskan economy, have gone up about 13.59  
21 percent which does mean more money in the state  
22 coffers from taxes.

1                   Our inventory of homes for sale has  
2 hit an all-time low, due in large part from the  
3 increased movement in the military. We've had  
4 quite an influx of new military personnel.  
5 However, our overall population for the state has  
6 experienced a net loss due to outgoing migratory  
7 patterns.

8                   Tourism, that's an area of our economy  
9 that was hit hard by the pandemic. And at this  
10 time it remains to be seen what this season will  
11 bring. It has been compounded by a lack of  
12 cruise ships that are able to travel to Alaska,  
13 because the Canadian government has closed their  
14 borders both to cruise traffic as well as over  
15 the road travelers coming into the state.

16                   Hopefully, we'll see an increase in  
17 tourists flying into the state from last year.  
18 And most of our business customers in the tourist  
19 industry are guardedly optimistic.

20                   We continue to be concerned about  
21 providing a healthy, safe work environment for  
22 our employees and making sure that our customers

1 have the tools they need to be successful,  
2 whether that be with loans, or deposits, or  
3 buying a home, whatever their needs are.

4 I appreciate the opportunity to speak  
5 to you today. And I appreciate the opportunity  
6 to participate on this committee. It's been a  
7 pleasure to be a part of it. Thank you very  
8 much.

9 MR. WHARTON: Good morning, fellow  
10 community bankers. My name is PJ Wharton. I am  
11 in Steamboat Springs, Colorado. And I'm very,  
12 very pleased and honored to join such a wonderful  
13 group.

14 Yampa Valley Bank was established 20  
15 years ago, and our mission is to put the  
16 community first. And if we flash back a year ago  
17 from now, it was really quite a scary time, and I  
18 think I speak for all of us. It was quite a  
19 scary time and one in which we were desperately  
20 worried about the future.

21 Our ski area, Steamboat is a major ski  
22 area, so we are a resort community, very, very

1 heavily dependent upon our ski area. And it  
2 closed one month early. We lost two very, very  
3 key months in which we have folks flying in from  
4 all over the nation, all over the world for their  
5 spring breaks.

6 So those last two weeks, four weeks to  
7 be total, put a great deal of stress on our  
8 community. The Yampa Valley Bank, in our efforts  
9 to lead, and following the FDIC and the Federal  
10 Reserve with PPP loans, again, as many of you,  
11 your communities and your bankers worked late,  
12 nights, weekends, holidays, et cetera.

13 And for a bank that, again, a year ago  
14 we were \$375 million, today we're at \$469  
15 million. We were able to book 569 PPP-1 loans in  
16 four months of last year.

17 So again, I'm sure I'm echoing the  
18 sentiment of all of you. It was very stressful,  
19 it was chaotic, but we got it done. And again,  
20 we received calls from business owners,  
21 restaurants, hotels, resorts, small businesses,  
22 contractors, et cetera.

1                   And frankly, that was the silver  
2 lining to a horrible COVID crisis, is that  
3 community banks shined. Our bank, Yampa Valley  
4 Bank, did as many PPP-1 loans as our four major  
5 competitors combined. And I think for all of us,  
6 as community bank leaders, this really has been  
7 our opportunity to shine compared to the mega  
8 banks that really had 1-800 number or frankly  
9 referred customers our way to find their PPP-1  
10 loans.

11                   So in hindsight, as horrible as COVID  
12 has been, we are very, very grateful that we did  
13 not have any hospitalizations for any employees.  
14 Of course, we have had, you know, COVID  
15 positives, we've had people quarantined, et  
16 cetera. But thankfully, we have not had any  
17 hospitalizations in our community. Of 12,500  
18 people, we had a total of 20 deaths over the past  
19 year, most of those unfortunately in a retirement  
20 home.

21                   Back to the bank, again, similar to  
22 you, I think 2021 has been the most difficult



1 budgeting year we've ever established. With  
2 growth of 40 percent in the past 12 months,  
3 deposit growth of \$150 million in the past 12  
4 months, it's been incredible to try to figure out  
5 how are we going to grow, if we will grow. And  
6 frankly, we budgeted our balance sheet to shrink  
7 in 2021.

8 With a new administration and PPP-2,  
9 that has not occurred. And again, similar to  
10 you, we are up about seven percent year-to-date  
11 in terms of our balance sheet.

12 PPP-2, we are projecting to be  
13 approximately 40 percent of PPP-1. And those  
14 dollars, coincidentally, are fee income, about  
15 \$1.2 million, ironically. And it was not  
16 planned, but we funded our allowance for loan and  
17 lease losses approximately that exact same  
18 amount.

19 Our allowance today stands at 2.2  
20 percent. We have not had any asset quality  
21 deterioration. We expected it probably the  
22 fourth quarter or first quarter of this year.

1 Thus far, that has not happened. And again,  
2 similar to your customers, our customers have  
3 been hoarding cash, been sitting on massive  
4 amounts of liquidity.

5 We are hopeful, through a very busy  
6 summer for our resort community, with campers and  
7 other folks coming here to hike, ski, and fish,  
8 that some of that liquidity will be released.

9 One other area that has been a  
10 concern, and an unintended consequence of the  
11 tremendous liquidity that's been provided by the  
12 stimulus and the PPP, has been the pressure on  
13 our leverage ratio.

14 We're very grateful and glad that we  
15 have participated as a community bank in the  
16 leverage ratio for community banks. But I would  
17 really feel that this is an important item to be  
18 considered in 2021, as it has gone from 8 percent  
19 to 8.5 percent as a minimum. That pressure has  
20 not changed and, in fact, has increased in 2021  
21 due to the tremendous liquidity of the system.

22 Overall, we are very, very excited as

1 we look forward. We are very grateful for the  
2 partnership with the FDIC. Madam Chairman, I've  
3 very pleased to announce, ironically, we just had  
4 our exit meeting with the FDIC for safety and  
5 soundness on Friday. We'll have our Board  
6 meeting this Thursday.

7 And I'm very honored and pleased to  
8 present that the team was excellent. We view  
9 them as a partner, and we had wonderful  
10 conversations, a few debates, but overall the  
11 outcome was excellent for all parties involved.

12 Overall, in conclusion, we're very,  
13 very pleased to be part of the FDIC, be part of a  
14 great community of bankers like you, and I look  
15 forward to meeting each of you in person  
16 hopefully in July. Thank you.

17 MS. KEA: Thank you, PJ. Let me just  
18 check in. Ken Kelly is scheduled to be next.  
19 Ken, could you speak and let's see if we're ---

20 MR. KELLY: Yes. Can you hear me?

21 MS. KEA: We have you. Thank you.

22 Please go ahead.

1                   MR. KELLY: Okay, great. I apologize  
2 for the technical difficulties. Let me say good  
3 afternoon and good morning to others, Madam  
4 Chair, and Director Gruenberg. Thank you all so  
5 much for convening this group in the way that you  
6 have. It has been a pleasure of mine to serve on  
7 this.

8                   And for those of you who I haven't  
9 met, I'm Kenneth Kelly. I serve as Chairman and  
10 CEO of First Independence Bank which is located  
11 in Detroit. We have been in business now for 51  
12 years. We were one of the positive outcomes of  
13 the 1967 riots in Detroit, serving predominately  
14 in the commercial market, residential market, and  
15 we also do commercial leasing.

16                   Many of the sentiments my colleagues  
17 have expressed are true for us in the Detroit  
18 market. We've been faced with challenges  
19 relative to now, challenges relative to  
20 residential mortgages, even though that is going  
21 up at this point in time. But I would say the  
22 outlook is still very positive and very bright

1 for us.

2 So I won't get into the specifics of a  
3 lot of the hard numbers. But what I will tell  
4 you at a very high level is we are seeing many of  
5 the same trends that have been discussed by my  
6 peers. More specifically though, what is very  
7 positive, and Madam Chair, I want to give you  
8 some credit for this, is we're seeing a lot of  
9 interest in minority banking across this country.

10 We had the announcement with Wells  
11 Fargo last March, before the pandemic, of an  
12 investment of \$50 million coming into the MBI  
13 space. There's an announcement that actually  
14 just took place a few hours ago, the second phase  
15 of that investment is taking place into the MBI  
16 community. So we're very grateful to Wells.

17 But there have been many other banks,  
18 such as Bank of America and many others, who have  
19 seen the need for MBIs having a foothold in  
20 reaching some of the capillary neighborhoods  
21 where many of the MBIs serve. So we're very  
22 grateful for that level of interest and the level

1 of supporting collaboration.

2 I will tell you we are seeing the need  
3 for more collaboration to move forward in respect  
4 to the PPP. What we have seen in our polling has  
5 shown across not only the National Bankers  
6 Association but many of the other organizations  
7 like the Urban League, and the NAACP, that we did  
8 not see the fulfillment of the intention of PPP  
9 reaching into, really, the deepness of some of  
10 those communities.

11 There are many reasons for that. I  
12 won't get into the details on this call. But  
13 what I do know is the efforts that we are seeing  
14 inside of the FDIC to look at standing up a fund  
15 to create support creates more capacity for  
16 collaboration and partnerships to reach to these  
17 deeply needed areas in the community.

18 So I just want to say again thank you  
19 to Madam Chair for the efforts and pushing in  
20 that regard and helping corporates come to the  
21 area of ensuring that there is equality and  
22 inclusion in our financial system.

1           At a higher level, I would say again,  
2 I'll ask all of our colleagues to look at the  
3 data. I think anyone with a high level of  
4 education would understand that this data really  
5 demonstrates some of the disparities that we're  
6 seeing in home ownership across the country, and  
7 network across the country, et cetera.

8           And I believe that we, as bankers, can  
9 take on a leadership role and make a big  
10 difference across the spectrum in tackling some  
11 of these long challenging statistics that show  
12 these disparities.

13           So again, I bring you greetings from  
14 Detroit from First Independence Bank. And, Madam  
15 Chair, and Director Gruenberg, thank you so much  
16 for allowing us to have this opportunity to  
17 participate in this program.

18           MS. GETZLAFF: I am Sarah Getzlaff. I  
19 am the CEO Security First Bank of North Dakota  
20 which is a \$200 million bank in Central North  
21 Dakota. (Audio interference.) members that  
22 (Audio interference.) during that week peaked at

1 a 16 percent daily positivity rate.

2 And we've dropped really quickly after  
3 that, and we've been under five percent since  
4 Christmas. And so our state has been very  
5 fortunate in that we have basically been really  
6 open since Christmas. And mask mandates ended in  
7 the middle of January.

8 Schools have been open since last  
9 fall. In-person, some of them are even starting  
10 to unmask. We've had group sports, and bars, and  
11 restaurants, and everything has fairly reopened.  
12 And things really feel like they're getting back  
13 to normal here which hopefully will continue to  
14 spread across the country very soon.

15 Overall, our loan portfolio is really  
16 clean, our ag Plus portfolio is doing really  
17 well. Government stimulus has definitely helped  
18 a lot. There's a really good crop in 2020. We  
19 haven't had a lot of moisture, rain or snow this  
20 winter so we're all a little worried about the  
21 2021 crop.

22 Other areas of our economy, our



1 residential real estate portfolio is super  
2 strong. Our market is really strong, housing-  
3 wise. On the commercial side, we're really  
4 concerned about the commercial market, because we  
5 have heard that a lot of businesses are going to  
6 keep people working from home long term. But  
7 like I said, overall our economy has been pretty  
8 well throughout COVID.

9 As North Dakotans we get teased a lot  
10 about where we live, and the weather here and,  
11 oh, there's not much to do. But I heard person  
12 after person say it's been really good, a good  
13 time to be living in this area.

14 And we have a lot of good help.  
15 Department of Commerce stepped up and did a lot  
16 of grants for shut-ins and owners of restaurants,  
17 because the hospitality industry as a whole. PPP  
18 loans are, of course, were a huge help. Last  
19 year we originated 160 of them, and since our  
20 economy has been slow we didn't think we'd do as  
21 many in the second round but we've actually done  
22 twice as many. We had 295 in this second round.

1 And of those 295, only a quarter of them are  
2 second jobs. Most of them have been first jobs  
3 to farmers which came about after the SBA changed  
4 the scheduling calculation which made more  
5 farmers eligible to apply.

6 We also have the only state-owned bank  
7 in North Dakota, called the Bank of North Dakota.  
8 And they have sort of partnered with local  
9 community banks to offer additional one percent  
10 loans and other low interest rate loans to  
11 struggling businesses.

12 They had required them to apply, and  
13 it does have to be paid back, for the most part.  
14 But that was really helpful. And through our  
15 local legislature, they also offered grants where  
16 they would help banks retroactively make interest  
17 payments that were made during COVID.

18 And those interest payments went  
19 directly to our bank and to other banks in the  
20 state. And then we were able to refund money to  
21 our customers and help them, you know, with their  
22 cash flow which was huge. And so Bank of North

1 Dakota has been a huge help to us.

2 And I think that kind of starts with  
3 interest in people owning a state-owned bank.  
4 I've had a lot of questions on it lately. And,  
5 you know, the effort has worked really well.  
6 They're really kind of the banker's bank in North  
7 Dakota. And I think that a banker's bank can do  
8 everything that Bank of North Dakota can do, for  
9 the most part.

10 And they don't compete against us,  
11 they don't do any direct lending. They basically  
12 buy loans participations for us, and then they  
13 help us with loan programs that in other states  
14 community development entities offer or state  
15 agencies like the Department of Commerce might  
16 offer.

17 And so I think that it's always great  
18 to be looking for a new way of doing things.  
19 Sometimes I think people are looking for this  
20 special charter or this special type of bank that  
21 will solve things that are a problem and they  
22 both sort of need that. It's actually already

1 being met or able to be met somewhere else.

2 And so I just hope that, you know,  
3 some of these big companies where there's  
4 somebody looking for an ROC charter or maybe  
5 they're lobbying for a state-owned bank, really  
6 has, you know, the correct motive at heart and  
7 isn't going to put some sort of unnecessary risk  
8 on a banking system when the FDIC's charters are  
9 all tried and true charters.

10 And I think that COVID proved more  
11 than ever that our banking system works really  
12 well and community banks especially are really  
13 strong. And they meet all the needs of our main  
14 street, and our communities, and there's really  
15 no need to mess with a good thing, in my opinion.

16 Thank you for the time, and I really  
17 appreciate the opportunity.

18 MR. MCCURRY: Hello, this is Neil  
19 McCurry with Sabal Palm Bank in Sarasota,  
20 Florida. It's an honor and privilege to meet  
21 everybody with the FDIC as well as my co-members  
22 of the Advisory Committee.

1           It's been a whirlwind of a year for us  
2           in the state of Florida at Sabal Palm Bank. And  
3           I'm pleased, as we sit here today, to tell you  
4           that, in our area, that most trends have improved  
5           significantly.

6           Our unemployment rate has now dropped  
7           to where it was in pre-COVID levels, which is a  
8           very low rate. The housing market continues to  
9           be strong. Small businesses have by and large  
10          rebounded.

11          Now, certain industries, hotels and  
12          restaurants, certainly had struggles through most  
13          of 2020. But with an uptick in tourism and the  
14          growing housing market, those sectors have done  
15          well, as the other businesses have.

16          So as we sit here in the second  
17          quarter of 2021, you know, we feel very good  
18          about our outlook. That being said, a little  
19          over a year ago it was completely different.

20          We, as a bank, started having COVID  
21          management meetings in February of last year.  
22          And as the days and weeks went on, we became

1 progressively concerned. Florida was severely  
2 hit during the last Great Recession. And I was  
3 concerned that we were looking at another  
4 scenario, Great Recession Number Two, and what  
5 the impact would be on our community, our  
6 businesses, individuals, and the banking sector.

7 And we made a decision early on that  
8 we were going to be a leader when it had to do  
9 with COVID and supporting businesses. We didn't  
10 know what that meant, but we knew that we had to  
11 be out front.

12 And I want to applaud the Atlanta FDIC  
13 Regional Office. I reached to them in early  
14 March of last year and asked them if we could  
15 have permission to proactively work with all of  
16 the bank's loan customers to modify their loans  
17 to interest only for all of 2020 with the idea  
18 that the businesses and the individuals would be  
19 better suited having some additional liquidity as  
20 we went into this crisis. They were outstanding  
21 to work with, and that program was very well  
22 received by our customers and the community as a

1 whole.

2 We then, shortly thereafter,  
3 transitioned when we learned about the PPP  
4 program. We didn't know if it was a good  
5 program, or a bad program, but it was the only  
6 program. And we said we were all in on it.

7 We completely restructured how the  
8 bank worked, working evenings, weekends, both  
9 ultimately to serve the customer. We were  
10 working through the middle of the night when  
11 there were the technology problems.

12 And I feel extremely pleased that at  
13 this point we've provided over 1,500 PPP loans to  
14 businesses, small businesses in our local  
15 community, about \$125 million worth of those  
16 loans. So we feel very proud that we've been  
17 able to accomplish that for the community.

18 And we have also done, I think, a good  
19 job of reaching out to people in the community  
20 that were not only frustrated with other  
21 organizations that didn't have the same  
22 commitment to the program, but also to businesses

1 and individuals that were under banks, weren't  
2 sure about how to work through the program. We  
3 put on informational webinars throughout the year  
4 on how to apply for a PPP loan, how to do it  
5 specifically with Sabal Palm Bank.

6 I want to mention to Mr. Kelly that we  
7 have, in Sarasota, an outstanding NAACP chapter  
8 with great leadership. And our bank and many  
9 other businesses worked hand-in-hand with them.  
10 And I think the whole community has made sure  
11 that everybody has been looked after during this  
12 crisis.

13 We've noticed that, in the second  
14 round of PPP loans, our average loan size is  
15 approximately 30 percent of what it was the first  
16 time. Our first round it was loans that were  
17 approximately \$90,000 average. And they're  
18 \$25,000, \$30,000, with loans down, in some cases,  
19 under \$1,000.

20 And we actually continue to stay busy  
21 with the PPP loans. Because we are continuing to  
22 let our community know that they are available,



1 and we're here to help. And every day, we  
2 continue to have an active amount of new  
3 customers that need assistance.

4 A surprising amount are first draw PPP  
5 loans, people that, for whatever reasons, did not  
6 receive a PPP loan in 2020. And we've helped  
7 them through that process as well and were glad  
8 and pleased to be able to help them as well.

9 Certainly looking forward, we have  
10 some real concerns, cybersecurity, you know, the  
11 most recent events with Microsoft.

12 We're learning, and I think that we  
13 need to continue to collaborate as an industry  
14 and regulators on how to protect the industry,  
15 the customers' information, everything involved  
16 that I think the challenge that every one of us  
17 has and need to partner together on and, again,  
18 continue to find ways to be innovative, to  
19 support the banking industry of the future.

20 And with that said, I'll turn it back  
21 over. And thank you very much.

22 MR. WEST: Hi, I'm Andrew West from

1 Eagle Bank in Polson, Montana. Eagle Bank is one  
2 of very few tribally-owned banks in the United  
3 States. We are \$96 million in assets. We've  
4 been open for about 15 years. Our original  
5 mandate was to bank the underbanked and unbanked.  
6 And we continue to take that mission to heart  
7 today. We also operate as a state-chartered  
8 community bank, and we bank tribal members and  
9 non-tribal members as well.

10 One of the interesting things that has  
11 happened during the COVID pandemic with Montana  
12 is that now that people have the opportunity to  
13 work remotely, there has been a tremendous influx  
14 of people moving from other places to Montana,  
15 particularly western Montana where I live and  
16 work.

17 The results of this have been a  
18 housing shortage and increased mortgage amounts  
19 which has been very good for our bank. It's  
20 helped offset the reduced (Audio interference.)  
21 the margin (Audio interference.) compression  
22 resulting from the low interest rate environment.

1           But we are seeing cash offers on homes  
2           that are, I mean, essentially it becomes an  
3           option for people to buy homes. And this is  
4           driving the prices up to the point where Native  
5           Montanans can't really even afford a house  
6           anymore which is a little bit of an issue.

7           These houses are being bought sight  
8           unseen, and construction costs are very high as  
9           well. When (Audio interference.) commercial  
10          activity it's moderate. And we, like everyone  
11          else, did a lot of PPP loans which I think helps  
12          not only our customers, but it also helps the  
13          banks. Because when the customers can continue  
14          to operate they are not, you know, they are not  
15          defaulting on their loans which also helps the  
16          banks.

17          We are seeing a lot of multi-family  
18          construction in the larger, more urban parts of  
19          Montana, Bozeman, Missoula markets, Kalispell,  
20          those are all growing rapidly with a lot of new  
21          construction for a single family residence but  
22          also multifamily.

1                   We're starting to see a comeback in  
2                   the hospitality industry. The restaurants and  
3                   hotels are doing better. Of course, the COVID-19  
4                   forbearance agreements that we did for folks  
5                   helped a lot and also the PPP loans. And Montana  
6                   also had a Montana Board of Investments program  
7                   that gave working capital loans where a portion  
8                   was automatically forgiven by the state.

9                   So we are seeing a continual declining  
10                  of consumer lending. This is primarily probably  
11                  a function of our lobby is still closed. The  
12                  tribe, the Confederated Salish and Kootenai  
13                  Tribes, who own my bank, are very proactive and  
14                  concerned about keeping people safe.

15                  And as such, they have supported me  
16                  keeping the lobby closed on a single branch bank,  
17                  so I can't lose anybody. So we just elected to  
18                  be concerned and stay closed, which hasn't really  
19                  affected our business negatively. We've had  
20                  record years, like I'm sure, everyone has, large  
21                  inflexible liquidity which gives us a lot of ammo  
22                  to make loans.

1                   With regard to agriculture, this is,  
2                   in western Montana, agriculture is a declining  
3                   operation, mostly because the price of real  
4                   estate is so high that it makes it almost  
5                   impossible for someone new to get into the  
6                   business. And it makes it very difficult for a  
7                   successful (Audio interference.) operation,  
8                   because it just does not pencil.

9                   In eastern Montana agriculture is,  
10                  they have had very little precipitation this  
11                  year. And they're very concerned about drought  
12                  activity. And then also there's been a spate of  
13                  grasshoppers the last couple of years which  
14                  really harms the crops. The government  
15                  assistance though started to trickle down and is  
16                  now helping the ag producers in the state.

17                  Overall, I'd say Montana typically  
18                  lags the rest of the United States. Our  
19                  unemployment is still low, around 3.8 percent.  
20                  And, you know, overall the state's doing okay,  
21                  outside of the fact that there's definitely a  
22                  changing dynamic here. We have tons and tons of

1 people moving in, and as such, it's just changing  
2 the nature of this entire state, but primarily on  
3 the west side.

4 Overall though, I think my outlook is  
5 cautiously optimistic. And I am hopeful that  
6 things will continue to rebound and that we will  
7 see a strong 2021. And thank you for the  
8 opportunity, I appreciate it.

9 MR. NARVAEZ: Good morning to those of  
10 you on the West Coast, and good afternoon to  
11 everyone else. I'm Gilbert Narvaez, Jr. I am  
12 President and CEO of Falcon Bank.

13 I'd like to thank Madam McWilliams,  
14 Chairman McWilliams, Director Gruenberg, Betty  
15 Rudolph, Arleas Kea, and the rest of the FDIC  
16 staff here today for the opportunity to  
17 participate and serve in the Advisory Committee.  
18 I'd also like to thank my fellow committee  
19 members for their time and efforts in  
20 participating today.

21 Our bank is headquartered in Laredo,  
22 Texas, and we are celebrating our 35th year in

1 existence and we are fast approaching the \$1.7  
2 million mark.

3 We conduct a significant part of our  
4 business along the Texas/Mexico border. The  
5 bank's 17-branch footprint also extends into the  
6 south central Texas region which includes the San  
7 Antonio and Austin metropolitan areas.

8 Our branches service communities that  
9 are comprised of predominately Hispanic  
10 population and also serve many customers in the  
11 low to moderate income areas.

12 Being that Laredo is one of the  
13 largest ports of entry between the US and Mexico,  
14 international trade and transportation sectors  
15 continue to be very active and very important  
16 sectors of our operating environment. We are  
17 very grateful that throughout this pandemic, the  
18 international bridges have remained open for the  
19 international trade business.

20 The local economy has improved to a  
21 level as close to business as usual as possible,  
22 with the exception of continued safety COVID-19

1 protocols which is pretty much the norm  
2 everywhere. The new number of COVID cases and  
3 hospitalization rates continue to decline to all-  
4 time low levels in our areas. This has been  
5 mostly attributed to the continuation of safety  
6 protocols and aggressive vaccination efforts.

7 Percentages of the population in the  
8 areas we operate have received at least one dose  
9 of the vaccine ranging from 35 percent to close  
10 to 60 percent in some of the areas. I'm happy to  
11 report that over 75 percent of our bank staff is  
12 fully vaccinated. And we've actually had a very  
13 proactive approach in trying to get everybody  
14 vaccinated.

15 Our customer and employee safety has  
16 always been of utmost importance to us. So we  
17 have fully opened up all the branches to normal  
18 hours. However, we continue to operate with the  
19 proper, safe social distancing protocols.

20 We have only five percent of our  
21 workforce that is currently working, still  
22 working remotely. And that's from a high of 35



1 percent that we've had at the peak of the  
2 pandemic.

3 Locally, in our areas, most grade  
4 schools have resumed in-person schooling.  
5 Universities and higher education programs still  
6 are being conducted in a hybrid model on campus  
7 and virtually.

8 We continue to support our community.  
9 We continue to meet the banking needs of our  
10 customers. We continue to participate in the  
11 latest round of the PPP Program. The second, the  
12 most recent round has been about half of the  
13 dollars and the number of loan requests that have  
14 come in from the original round.

15 So we continue to also assist the  
16 local food banks and other civic organizations on  
17 any pandemic-related relief efforts. So we've  
18 really been, we try to be one of the leaders also  
19 in the community to make sure that we are out  
20 there. We were the first economic responders.

21 We continue also to assist our  
22 borrowers with the submission of the PPP note

1 forgiveness documentation to escalate, which has  
2 been a nightmare to some of our customers, you  
3 know, after the first round. But I think SBA has  
4 smoothed up the process now.

5 Other areas and components that are  
6 being affected, earnings, our earnings at the  
7 bank have stabilized. But they still have been  
8 adversely affected from prior years. And that's  
9 a direct result of the further compression of our  
10 net interest margin caused by this zero interest  
11 rate environment.

12 Liquidity continues to be plentiful,  
13 just like everybody else. Loan demand has slowed  
14 in most sectors but very competitive in those  
15 sectors with activity. So we're competing with  
16 the, you know, low rates. And we're competing  
17 also with fixed rate products that we've not seen  
18 in our banking career.

19 Capital, we're strong and healthy  
20 despite the slight decrease in earnings. Our  
21 credit quality, we've seen a slight uptick of  
22 non-performing loans on some customers that are

1 struggling to get back on their feet. However,  
2 these trends are still far below our  
3 expectations, our earning expectations.

4 Thank you for the opportunity to  
5 report on our local trends and conditions. I'd  
6 like to introduce our next scheduled committee  
7 member speaker, Betsy Johnson, President and CEO  
8 of Solutions Bank.

9 MS. JOHNSON: Thank you, and good  
10 afternoon. I come to you from Illinois, land of  
11 Lincoln, Ulysses Grant, Ronald Regan, and don't  
12 forget the Fighting Illini which, I think,  
13 they're still licking their wounds from March  
14 Madness.

15 So, like Gilbert said, Betsy Johnson,  
16 I'm in the middle of the list, so we might be  
17 half-way through, President and CEO of Solutions  
18 Bank. We're in northern rural Illinois and we've  
19 got locations in Forreston, Freeport, and Kent,  
20 two hours west of Chicago, about a quick half an  
21 hour from the Wisconsin's southern border.

22 The history of our banks, two long-

1 time banks brought back pre-Depression, two bank  
2 holding companies from '98 to 2014. We were  
3 merged with two charters and went to a service  
4 center with our core processor, Fiserv, due to  
5 changes in technology, cost of technology, and  
6 digital ranking services. And we also eliminated  
7 some shared employees we had between the banks  
8 due to, you know, continued regulatory  
9 obligations.

10 And beginning in 2020, we just  
11 acquired a \$100 million community bank with two  
12 more locations. And we merged those charters  
13 with our existing Forrester State Bank. And in  
14 September 2020, we branded with a name change and  
15 went through that process which is working out  
16 very well.

17 We just recently announced another  
18 agreement to acquire a \$120 million community  
19 bank with also two locations upon regulatory  
20 approval. And we'll merge those should  
21 everything be approved in first quarter of 2022.  
22 That puts us at seven locations in four very nice

1 counties in rural northern Illinois at about \$407  
2 million.

3 Solutions Bank is mainly an  
4 agricultural bank. We're gaining more in the  
5 commercial business area with those additional  
6 locations and larger communities. Our ag  
7 portfolio is about 90 percent crop farmers. So  
8 very little livestock.

9 Land values, which, you know, are  
10 consistent with other bankers that I hear  
11 throughout the states, remain constant and, I  
12 think, at a very high level. It's a typical  
13 story, demand from the neighbors, a lot of  
14 generational farmers, of course, which is one of  
15 the reasons we felt we needed to grow the bank to  
16 keep up with our growing customers and to service  
17 them.

18 Experiencing very little to no  
19 delinquencies, especially no delinquencies in the  
20 ag sector. And also another topic I know is  
21 carryover, we're seeing very little of that. Our  
22 customers are ag customers that have been, over

1 the years, become very sophisticated, not only  
2 with their equipment but handling of their  
3 commodities and products to be successful.

4 COVID, like other banks, our staff has  
5 been extremely resilient as well as our  
6 customers, willing to be accommodated through  
7 appointments, drive through. They take advantage  
8 of the digital services, fortunately that we  
9 already had in place. And it's been then still a  
10 very successful year during 2020 for the bank.  
11 And we also look to continue that through '21.  
12 We anticipate moderate growth though.

13 Communities in our area really didn't  
14 suffer financially as they did in other areas  
15 within our state. I can speak of Chicago which  
16 still seems to appear to be somewhat a ghost town  
17 compared to pre-COVID.

18 Illinois struggled with a vaccine  
19 process. But as of the last several weeks,  
20 fortunately that has been made available to  
21 bankers as essential workers after a plea to our  
22 Governor.

1           We have people going, even retirees  
2 going up to Wisconsin borders to get that. So  
3 sorry about that. I speaking Wisconsin vaccines.  
4 But again, we do what we need to do and hope to  
5 get it done.

6           State of Illinois unemployment rate is  
7 a high at 7.7, the last I have reported. A year  
8 ago it was just under four percent. State of  
9 Illinois itself has its own issues, you know,  
10 prior to COVID.

11           Even though Illinois is still, well,  
12 it's still second to the state of big Texas in  
13 number of bank charters. Last report, I believe  
14 it was 396 charters in the state of Illinois,  
15 down approximately 13 percent. And I hear from  
16 brokers that number is going to continue to  
17 increase as a lot of acquisition mergers were  
18 held up due to COVID.

19           State of Illinois still each year  
20 proposes their own bank, and I hope that never  
21 occurs. So as in the State of Illinois right  
22 now, I can't imagine them running a successful

1 bank as it is today. But that's probably not  
2 funded as State of Illinois.

3 Examination processes though, our last  
4 state exam was held virtually and went very well.  
5 They have to utilize the FDIC's Connect. To  
6 thank you very much, because that is an excellent  
7 tool. A couple of years ago, our last FDIC exam,  
8 we were able to use the FIVE by Image Viewer for  
9 examinations of which we were a Beta 4.

10 We had that opportunity, so I signed  
11 us up for our quarter. And I asked my staff if  
12 that was okay. And of course, fortunately, they  
13 said that sounded like a great idea. So our FDIC  
14 exam that we had, we went through that. And the  
15 examiner and both us, that was our first time  
16 using it, I hope it's still active and being  
17 used, it was fantastic.

18 PPP loans were very much the same as  
19 other banks. Our numbers for PPPs from the time  
20 that it started, we did approximated 350 loans,  
21 \$6.7 million, \$4.8 million is still on our books.  
22 That equals to about 250 loans.



1           And the other, a very nice line item  
2           on many of our income statements was the income.  
3           So that was a very nice thing and helped, I  
4           believe, everybody out through 2020.

5           Our PPPs ranged, I just want to  
6           comment about the associations. We were not an  
7           SBA lender, so we had to go through two different  
8           fintechs to be able to utilize that process. And  
9           every day was, we all know, it was different,  
10          things changed, especially when it first came  
11          out.

12          Our bankers, our lenders were just  
13          amazing. The industry support through the  
14          associations, the OIBA and the ABA, were  
15          extremely helpful. And like I --- I always tell  
16          everybody, bankers are problem solvers. And they  
17          reached out to other bankers, and it was just  
18          truly amazing. I'd like to see how that happens.

19          Again, I think we are problem solvers,  
20          and I am glad to be on this committee. Chairman  
21          McWilliams, very pleased to tell you that I think  
22          have brought some great enthusiasm and energy to

1 your office. And I hope that's not only  
2 perception but a reality for the FDIC and your  
3 staff. I think they are wonderful, all that I  
4 have come into contact with.

5 So I hope our -- our topics are  
6 sometimes dry, and the process regimented. So I  
7 appreciate your next attempt to lighten the mood  
8 in them. Thank you very much.

9 MR. HAYES: Good afternoon. Can  
10 everybody hear me okay?

11 MS. KEA: Yes, we hear you fine, thank  
12 you.

13 I'm sorry, it does appear now that  
14 you've gone on mute, Steve?

15 MR. HAYES: What, what now?

16 MS. KEA: You're good.

17 MR. HAYES: Okay, great. Again, thank  
18 you for this opportunity, Chairman McWilliams,  
19 and Director Gruenberg, and the staff for this  
20 opportunity. My name is, again, Steve Hayes.  
21 I'm President and CEO of Dakota Prairie Bank,  
22 located in central South Dakota.

1 I'd also like to reach out to our  
2 newest members who were just recently appointed.  
3 This is a tremendous group to be a part of. And  
4 hopefully, someday, we can all get together.

5 Dakota Prairie Bank is third  
6 generation, family owned, established by my  
7 grandfather in 1906 with about \$120 million, \$125  
8 million in total assets, four locations. Three  
9 locations are in rural communities, populations  
10 of 500 to 800 people. And I would say we're  
11 probably 90 to 95 percent ag portfolio.

12 Our main office is located just across  
13 the Missouri River next to our capital of South  
14 Dakota's Pierre. And that community is about  
15 25,000 to 30,000 people. But there is a nice  
16 diversity in the commercial and the consumer type  
17 lending. So that's nice compared to the other  
18 locations which, like I say, that's always been  
19 ag since inception.

20 We talked a lot about COVID, and I  
21 think as mentioned about optimism but cautious,  
22 you know, we're seeing a lot of changes, some

1 positive changes moving forward here. All the  
2 staff, and our staff is back, back to work.

3 And I think the majority of the banks  
4 in the state of South Dakota are open. And there  
5 might be a few that it's appointments only in  
6 drive-up facilities. But for the most part,  
7 we're open.

8 I think overall it's going well. Our  
9 employees, I'd say the majority of our employees  
10 have had their shots and so forth. So really  
11 optimistic, but yet when I say that, I see  
12 there's an uptick of some COVID in that range, 19  
13 to 46, 47 year-olds. So hopefully the  
14 vaccinations continue on. And hopefully we can  
15 turn this around.

16 You know, I mentioned earlier about  
17 the \$120 million in assets. You know, part of  
18 the, a big part of the pandemic is obviously  
19 we've seen the increase in deposits and so forth.

20 Well, for us, you know, we're talking  
21 about the PPP loans. Our first go around, PPP  
22 was targeted for our commercial. We did about \$3

1 million at that time. And then a few months  
2 later we did the second round of PPP targeting  
3 the farmers and ranchers. And that's been over  
4 \$6 million right there.

5 And then there's the second draw of  
6 those PPP loans, you know, where they have to  
7 show a 25 percent decline in income from '19 to  
8 '20. So we're going to possibly see another \$2.5  
9 million of second draw loans. So that's been a  
10 big part for us, is that the PPP loans, because,  
11 you know, our economy itself, the PPP loans, the  
12 government assistance, they have helped  
13 tremendously. They really have.

14 Out here, we pretty much have the  
15 grain producers and the livestock producers. And  
16 our farm economy is going really well. I mean,  
17 we're seeing some nice changes in our equities.  
18 Our carry-over debt's been taken care of for the  
19 most part. You know, our livestock, obviously  
20 they've helped, tend to help as well. But, you  
21 know, it really has done very, very well. I  
22 mean, they really worked hard.

1           And as we're saying about resilient,  
2           they're really done a nice job. But it's helpful  
3           to have the government payments and so forth.  
4           But the commodity prices have really changed from  
5           a year ago. So we're excited about that.

6           As far as our commercial activity,  
7           we're seeing improvement. But I just hope that,  
8           you know, is it going to tell, maybe six months  
9           to a year from now? Because a lot of them are  
10          using the PPPs, the grants from the state and so  
11          forth, to get through.

12          So I'm hoping that this will start  
13          turning around in the restaurant and the hotel  
14          business here in South Dakota. Tourism, I think  
15          it's, we're seeing the uptick on bookings,  
16          especially out in the Blackhills, Mount Rushmore  
17          area. So that's really encouraging to see that.

18          As far as our numbers, you know, we  
19          turned out fairly well. It's the same issues we  
20          talked before, liquidity, and managing our  
21          balance sheets, and margin compressions. Because  
22          right now there's such a tremendous competition

1 for, you know, the good quality of loans and  
2 trying to turn that cash into a little bit of  
3 return. So that's been a challenge.

4 And I think the challenge moving  
5 forward is really just managing our balance sheet  
6 which is the same as we've heard before. And  
7 it's going to continue on.

8 If there's one thing that I mention,  
9 and there was another gentleman that brought this  
10 up about our community bank leverage ratio, and I  
11 know that expired in March, I believe.

12 You know, we just had our ALCO meeting  
13 this morning. And we were looking at the  
14 deposits coming in. And I see that more and more  
15 money is coming in from townships and counties,  
16 part of this last stimulus package. And so this  
17 is going to continue to grow, and grow, and grow.

18 And I just, you know, that's a  
19 challenge. We need to, it is what it is, and  
20 we're excited to be a part of the community, and  
21 excited to help. That's what a community bank  
22 is, we're all aware of what we can do. But it

1 poses some challenges. And I'm just curious to  
2 see if the FDIC has looked at maybe extending  
3 that but, overall, pretty excited, pretty  
4 excited. I think, overall things are going well.

5 I just want to conclude, for comment  
6 for Chairman McWilliams, in January of '21 we had  
7 a Safety Soundness IT and BSA all offsite. The  
8 crew from the Sioux Falls, South Dakota, office  
9 did a tremendous job. The communication, which I  
10 always say, both from the regulators and the  
11 bank, is number one. It needs to be there, and  
12 it was. It was really good. I mean, the  
13 communication was just super. They've been very  
14 accommodating.

15 If there's one thing that I want to  
16 comment on, and you've heard that before, I know,  
17 and it was brought up at the last meeting in  
18 October, you know, offsite has worked really  
19 well. I was nervous about the process, but it  
20 really has worked well overall. It really did.

21 But out here when you're looking at  
22 loans, sitting across a desk or a regulator, in



1 person would be very helpful. So I hope someday  
2 that we can at least get a part of our exam back  
3 to onsite.

4 But overall, thank you. Our Sioux  
5 Falls crew, regulatory crew, did a fantastic job.  
6 So I appreciate that. That's about all I have.  
7 Thank you again for the opportunity to be on this  
8 Board. And I look forward to the rest of the  
9 meeting. Thank you.

10 MS. OLDNER: Hello?

11 MS. KEA: We hear you, Marnie.

12 MS. OLDNER: Thank you very much. My  
13 name is Margaret Oldner on the schedule, but I do  
14 go by Marnie.

15 I am very pleased and proud to join  
16 this committee. I thank you Chairman McWilliams  
17 and Director Gruenberg for joining us today and  
18 for including me in this discussion.

19 I am the CEO and Director of Stone  
20 Bank, which is a \$540 million Arkansas-based  
21 small business and ag bank.

22 In addition, we originate about \$100

1 million of government guaranteed loans annually  
2 and have a nearly \$400 off-balance sheet  
3 portfolio of loans we service for others.

4 This bank, although chartered in 1955,  
5 was bought by a group of people, private folks,  
6 in Mountainview, Arkansas, in 2009.

7 At the time, the bank had dwindled to  
8 about \$10 million in assets and was in a dying  
9 south Arkansas farm town where the population was  
10 moving away, as were business.

11 So that bank, we really started over  
12 in 2009. I joined the bank in 2011. In 2015, we  
13 rebranded as Stone Bank and developed a growth  
14 plan to grow to a \$500 million bank by 2020.

15 We did reach that \$500 million target  
16 before COVID hit, and then we kind of surged  
17 ahead to that \$540 million rather quickly with  
18 the influx of deposits and with the origination  
19 of PPP loans.

20 In the state of Arkansas, we've done,  
21 the banks have done about 84,000 loans totaling  
22 \$4.7 billion.

1           At Stone Bank, we did almost 800 loans  
2           totaling about \$70 million in PPP loans. And  
3           most recently, that included Schedule F loans to  
4           farmers, which I think has been very helpful to  
5           our farmers who do suffer from very tight margins  
6           anyway and with the pressures that have been on  
7           our poultry farmers in particular due to COVID,  
8           that was very helpful.

9           In the state of Arkansas, I don't  
10          think we've suffered as significantly as other  
11          states as a result of the pandemic, but it has  
12          had an impact.

13          Our economy was not shut down as  
14          strongly as in some places, and the trends  
15          recently have been very favorable.

16          Right now, in the state of Arkansas,  
17          we have just over 1,600 active COVID cases. I  
18          think there's less than 200 hospitalized at this  
19          time.

20          And the trend numbers are very good.  
21          And so, we hope that it stays that way and that  
22          things can open up more and more.

1                   Like most banks, we are doing well.  
2           In the state of Arkansas, I think that we do  
3           outperform the nation as a whole when it comes to  
4           a return on assets and capital levels and  
5           earnings.

6                   And so earnings are strong for  
7           Arkansas banks this year and they are for us as  
8           well. Asset quality indicators are surprisingly  
9           good.

10                   I think Director Gruenberg mentioned  
11           that as well that that is a surprise. A year  
12           ago, we anticipated much more problems.

13                   We prepared a COVID-19 Impact Analysis  
14           and Plan among other things that meant we were  
15           moderating our growth rates and looking to  
16           preserve our capital and setting aside larger  
17           amounts of reserves for loan losses.

18                   We continued this approach through  
19           2/1/2021 but we still see no real significant  
20           signs of loan portfolio weakness.

21                   We are cautiously optimistic as well,  
22           but can't help but think struggling borrowers

1 will become more evident in the year ahead.

2 We hope for continued regulatory  
3 patience and guidance, which has been so helpful  
4 over this past year as we continue to work with  
5 struggling businesses and farmers to get them  
6 through the post-COVID months and back on their  
7 feet.

8 The cooperation between regulators,  
9 bankers, and borrowers could make a huge  
10 difference in the years ahead as we work to help  
11 our customers and communities through the post-  
12 COVID recovery period.

13 In addition to the concerns that  
14 surround uncertainty at every level, we also are  
15 concerned about the fast pace of changing  
16 technology.

17 We know that we are challenged to  
18 deliver services in a different way and that our  
19 customers do expect that.

20 The pandemic accelerated that a good  
21 bit, but it was already on a very fast changing  
22 pace.

1                   So as a community bank, we are looking  
2                   at ways in which we can do that carefully,  
3                   weighing the risks and the rewards.

4                   But there are so many fintech  
5                   companies to work with. We're on Fiserv. I  
6                   think about 71 percent of banks (video  
7                   interference) Jack Henry.

8                   All of them are not known for being  
9                   particularly nimble, and so as we try to deliver  
10                  the types of services that consumers seem to want  
11                  and need today, we do need the help of fintechs,  
12                  but being able to vet them all is a very big  
13                  challenge.

14                  We would love regulatory support and  
15                  help in combining ways that we can do due  
16                  diligence more in teams or in groups so that we  
17                  can share that information with one another.

18                  We're also concerned about the ever  
19                  growing cybersecurity threats, such as  
20                  SolarWinds, Finastra, and Microsoft that we  
21                  talked about earlier today.

22                  Managing fintechs is what I alluded to

1 as a concern for us and the threats to banks and  
2 consumers alike that are posed by special purpose  
3 charters.

4 And we are hopeful that the trend at  
5 the state levels to designate special purpose  
6 charters does not take off and that the federal  
7 regulators will help us with that.

8 I look forward to learning so much  
9 more from this committee. And again, I'm very  
10 thankful to be a part of it. I appreciate it  
11 very much.

12 MR. LOWRY: Hello, my name is Bruce  
13 Lowry. I'm President and CEO of Ireland Bank in  
14 southeast Idaho, headquartered in Moab, Idaho,  
15 which is a small town just north of the Utah  
16 border.

17 Our bank was founded in 1892 and we  
18 are currently the oldest state-chartered bank in  
19 the state of Idaho.

20 We have \$320 million in assets, 14  
21 branches, and about 108 employees. Five of our  
22 branches are located in communities where we are

1 the only financial institution, and so we're  
2 proud to be able to serve those kinds of  
3 communities.

4 Historically, we've been an  
5 agricultural bank. Today, the agricultural  
6 sector represents about 25 to 30 percent of our  
7 portfolio.

8 So we have diversified quite a bit in  
9 the last several years. Like everyone else in  
10 the last several months or a year, we've been  
11 dealing with COVID issues.

12 We did have to have a temporary branch  
13 closure in one of our communities for about a  
14 week, week and a half, due to staffing problems  
15 because of COVID.

16 We made it through that and worked  
17 through everything and now we're doing very well  
18 that way across our bank.

19 I would just echo some of the comments  
20 that a lot of the peers here have made and the  
21 concerns that we have in our area center around  
22 the growth of our deposit base.



1           And the economy is doing very well in  
2           our part of the world. We're having difficulty  
3           with housing and continuing to try to find ways  
4           to help people find affordable housing and as  
5           we're having great population migration in Idaho  
6           and it's driving the cost of real estate fairly  
7           significant.

8           We did do a lot of PPP loans, for us,  
9           anyway. We did around 270 of the first round PPP  
10          loans, \$13.5 million of those.

11          Second round is going to have a much  
12          higher number of loans, actually, which is a bit  
13          surprising, but a lot of that has to do with the  
14          Schedule F loans that others have mentioned.

15          But the dollar volume is about half,  
16          is what we're seeing on average.

17          I would just like to thank Director  
18          Gruenberg and Chairman McWilliams for having this  
19          forum for us and having the opportunity to serve  
20          on this committee.

21          Two years ago, our western region, the  
22          San Francisco region, would do roundtable

1 discussions with CEOs and I really enjoyed those,  
2 participating in those, and having the chance to  
3 talk to FDIC staff about things that we were  
4 facing and the issues that we were seeing and at  
5 least letting them know how things are on our  
6 side of the desk.

7 So with that, I look forward to the  
8 rest of the meeting and thank you very much.

9 MS. KITNER: Good afternoon. My name  
10 is Cindy Kitner. I am the President and CEO of  
11 Jefferson Security Bank in Shepherdstown, West  
12 Virginia.

13 I want to thank Chairman McWilliams  
14 and Director Gruenberg for your leadership and  
15 for this amazing opportunity.

16 I appreciate your interest in hearing  
17 the successes and challenges that we as community  
18 bankers face every day, and appreciate all the  
19 work and efforts of all of the FDIC staff.

20 Shepherdstown is located just across  
21 the state line from Maryland and with close  
22 proximity to Virginia. We are about 70 to 80

1 miles from Washington, D.C.

2 Jefferson Security Bank was embargoed  
3 in 1869 and is the oldest operating corporation  
4 in the state of West Virginia.

5 Our current asset size is just under  
6 \$400 million. We have six locations, five of  
7 which are in West Virginia in the counties of  
8 Jefferson and Berkeley.

9 These counties offer multiple banking  
10 options. Our share in recent unemployment levels  
11 of 4.2 and 4.9 percent, with growing populations  
12 and labor force participation rates that exceed  
13 the statewide and national averages.

14 Our counties offer strong employment  
15 opportunities from a variety of small and mid-  
16 sized businesses as well as large manufacturing  
17 facilities and distribution centers that are just  
18 across the state line.

19 Our sixth location is in Sharpsburg,  
20 Maryland, with a population of about 800. And in  
21 this case, we are the only bank in town.

22 Many of our employees and others in

1 the area have begun the vaccination process and  
2 some have received their second dose.

3 Our small businesses have done a  
4 remarkable job of adjusting during this pandemic.  
5 Some remained open throughout while others  
6 shifted to either online sales or carry-out  
7 options.

8 Our local residents have the option to  
9 engage to their personal level of comfort with  
10 shopping or dining to full capacity, limited  
11 capacity, or with carry-out options.

12 Our proximity to the  
13 Baltimore/Washington areas allowed some of our  
14 small businesses to expand their clientele during  
15 the pandemic, as many in the cities were looking  
16 for a close and safe getaway.

17 We actively participated in the PPP  
18 lending with 325 loans in round one for a total  
19 of \$15.4 million and an average of \$47,000.

20 Only 16 of those loans were over  
21 \$150,000. So far, we have 157 round two loans,  
22 and about 30 percent of those are draw ones.

1                   In total, when we factor in the  
2                   increases for the round ones, we have originated  
3                   a total of \$24 million in PPP loans.

4                   We've remained focused on ensuring our  
5                   small businesses that qualify have the  
6                   opportunity for these loans, and we continue to  
7                   see the recent activity with those loans.

8                   We all realize that this is a program  
9                   that provided us a unique opportunity to support  
10                  our small businesses, and like many others, we  
11                  took that role seriously.

12                  We worked diligently with our  
13                  customers to ensure an understanding of the ever-  
14                  changing rules.

15                  Financially, we've experienced the  
16                  same trends as others with increased asset size,  
17                  liquidity, and similar impacts on capital.

18                  We've also seen similar trends with  
19                  our loan delinquencies. We will continue to  
20                  focus on our allowance, our loan losses, and our  
21                  capital loans.

22                  In the first quarter of this year, we

1 completed our compliance as well as our safety  
2 and soundness examinations.

3 I appreciate the FDIC's efforts on a  
4 risk-based approach. I will say that it's not  
5 unusual for us to host a training team, but this  
6 training team was exceptionally large.

7 We had a good bit of conversation, and  
8 I hope that it was mutually beneficial. I know  
9 that we certainly saw benefit, and the team did a  
10 great job.

11 I want to quickly acknowledge the  
12 FDIC's academic challenge. Shepherdstown is home  
13 to Shepherd University, and one of my passions is  
14 working with our students.

15 We currently have two interns, one  
16 undergrad and one grad student, both of whom have  
17 expressed career interest in community banking,  
18 which is very exciting to us.

19 I also wanted to mention one  
20 regulatory matter, banking, and cannabis  
21 activities. I know this is not a new topic, and  
22 one that requires Congressional action, but this

1 is a growing concern for many of us in the area  
2 and others as the states proceed with  
3 legalization.

4 This is not a matter of personal  
5 feeling or opinion, but a request for regulatory  
6 guidance to help ensure as bankers we are clear  
7 and consistent when faced with new customer  
8 activities.

9 Thank you to Chairman McWilliams,  
10 Director Gruenberg, FDIC staff and others for  
11 your continued efforts on strengthening community  
12 banks.

13 MR. BOCK: Good afternoon. My name is  
14 Mike Bock. I'm the CEO of Dairy State Bank in  
15 Rice Lake, Wisconsin.

16 We are located up in Northwest  
17 Wisconsin, about 100 miles straight east of  
18 Minneapolis/St. Paul.

19 Our locations are in a mixed market  
20 area. Down in our south side, we have some prime  
21 agriculture. We have some light industrial and  
22 some educational and medical centers.

1                   And up in the north edge of our  
2 market, we are largely tourism, with lakes,  
3 resorts, lumbering. We do have some education  
4 centers and medical centers as well.

5                   When we started the COVID period, we  
6 were about a \$515 million bank. We have now gone  
7 in excess of \$650 million.

8                   Obviously, a lot of deposit growth  
9 taking place at that time, but we have not  
10 experienced the same level of loan traffic other  
11 than a lot of PPP work. Loans have been  
12 relatively flat.

13                  Wisconsin as a whole is fairing fairly  
14 well in the COVID challenges. Currently,  
15 statewide we have a 3.8 percent unemployment  
16 rate, which is almost back to the pre-COVID rate  
17 of 3.3 percent. So some positive trends going on  
18 there.

19                  Up north, we're still running about 5  
20 percent unemployment rate, but it's almost hard  
21 to believe at times because as we visit with our  
22 different businesses and industries around here,



1 virtually everyone is seeking help.

2 And I think that is going to be one of  
3 our biggest challenges going forward for our  
4 business customers and businesses in even the  
5 summer months, is just finding the help they need  
6 to get their jobs done.

7 COVID trends have been running pretty  
8 good up until last week. We had some negative  
9 trends as of late, still certainly within  
10 palatable levels.

11 We have had lobbies open at all of our  
12 locations on a somewhat limited basis since last  
13 November, and we have had them open.

14 We've had a few staff in and out with  
15 some quarantines, some positive tests, but  
16 overall, nothing serious.

17 Current vaccination rates in the area  
18 are running about 15 percent, growing every day.  
19 Real estate prices in the area have been really  
20 interesting.

21 It started on an upward trend early  
22 last summer, continued through the summer into

1 the fall, and it's being largely driven by people  
2 up in Minneapolis/St. Paul market.

3 Those of you that watch the news, some  
4 dynamics in the Minneapolis/St. Paul market last  
5 summer, some of the rioting, et cetera, with the  
6 onset of working remotely and some of the  
7 challenges of the Minneapolis market, some of  
8 those folks have sought places on the lakes over  
9 here and they've relocated and they are starting  
10 to work remotely and just going to the Twin  
11 Cities on an occasional basis.

12 So that's a great thing in terms of  
13 our area. We've got us some people. But it's  
14 obviously driving real estate prices. This was  
15 mentioned earlier by one of the people.

16 It is getting to the point where it is  
17 hard for some of the local residents to buy a  
18 place that they can afford.

19 And with our labor challenges, it  
20 becomes even more pronounced because affordable  
21 housing is almost a non-existent case right now.

22 Construction costs continue to go up.

1 There have been some multi-family complexes that  
2 have tried to go up.

3 They've run numbers and they're  
4 finding that the required monthly rental rate to  
5 make those things palatable is just not coming  
6 off very well, so that people in our markets with  
7 the employment that they're seeking is just not  
8 going to be able to afford that.

9 So we're kind of in an interesting  
10 balance, challenged by COVID but at the same time  
11 most of our businesses are challenged by labor  
12 shortages while they still work through the  
13 challenges of COVID.

14 2020, obviously, was an interesting  
15 year for everyone. Started out the COVID  
16 scenario, worst case scenario for everything and  
17 it turned out for some of our industries that  
18 they set new all-time records, both revenue,  
19 profit, right on down the line.

20 Now it wasn't everybody that was that  
21 fortunate, hospitality, being bars, restaurants,  
22 hotels, those types of businesses, were

1 challenged.

2 Bars and restaurants have bounced back  
3 relatively nicely but hotels continue to be  
4 challenged.

5 We'll see how that changes as we move  
6 to the summer months and maybe people come on  
7 board to start heading back to northern Wisconsin  
8 again.

9 Other areas that we've bumped into  
10 that has a few challenges is senior living  
11 facilities, not so much that they have occupancy  
12 issues or COVID issues, but we experienced some  
13 significant labor rate changes in that market  
14 around here, and most of those facilities, with  
15 the rentals that they do, take 12 to 18 months in  
16 order to adjust contracts for the residents that  
17 are there, to adjust for that.

18 Delinquencies currently for us are in  
19 very good shape. We've got just a couple  
20 restructured loans that do exist in the hotel,  
21 restaurant, and senior living areas, but I think  
22 those are going to be coming back on a full

1 performance basis in the next couple months. So  
2 we're looking good from that standpoint.

3 As we've talked to businesses as they  
4 finalize 2020 and receive financial statements,  
5 we're looking forward to 2021.

6 Guarded optimism, I guess, the word I  
7 would say. A lot of positive things are  
8 happening but some of these businesses are  
9 starting to run into challenges on different  
10 fronts.

11 Obviously, COVID still exists. I  
12 mentioned labor. We're running into a lot of  
13 supply chain issues over in this part of the  
14 country.

15 Businesses that are trying to get the  
16 raw materials they need to get the products done  
17 and out the door, they're having a lot of  
18 difficulty.

19 Pricing is good for about 24 hours.  
20 Most construction jobs will commit a 30-day price  
21 and it proceeds accordingly.

22 And as I mentioned earlier, obviously,

1 we've got some challenges in the loan world right  
2 now in terms of competition. It's relatively  
3 flat.

4           Liquidity is accessible over here, so  
5 we're starting to see some very, very competitive  
6 pricing and some very generous loan conditions  
7 that are being put together in terms of  
8 collateral rates and other underwriting issues  
9 that go with it.

10           So as there's guarded optimism looking  
11 forward, we're just not quite sure where that's  
12 going to take us.

13           A lot of businesses are saying six to  
14 nine months they feel very good about what's to  
15 come, but they're just not quite sure what's  
16 going to come beyond that.

17           Mortgage activity has been phenomenal.  
18 Again, a lot of the business we've had are  
19 customers coming over from the Minneapolis/St.  
20 Paul market.

21           Mortgage refinance continues to go on,  
22 but a lot of it is new purchase, a little

1 construction, but generally purchase work that's  
2 going on right now. And it's mostly out of state  
3 people that are buying our properties.

4 Mortgage lenders and customers still  
5 are adapting to the new mortgage loan  
6 applications, being pretty much in sync with  
7 that, but it's taking a little bit of time.

8 Like everybody else, we are very  
9 active in the PPP world. First round, we got up  
10 and running relatively quickly.

11 We were not an SBA lender previous,  
12 but we got in the system relatively quickly and  
13 we started moving loans relatively fast.

14 We did about 240 loans through the  
15 first wave, for a total of just short of \$25  
16 million. We have most of that first wave through  
17 the forgiveness process.

18 We're down to about 1,000 loans.  
19 We've got about six of those in the SBA black  
20 hole for different reasons.

21 There's some questions, there's some  
22 issues and things we're trying to resolve. We

1 have most of the first wave done.

2 We have basically doubled the number  
3 of loans in the second wave. The loan dollars  
4 are significantly less.

5 The second wave is definitely going to  
6 what we call the truly small business, the self-  
7 employed, the small farmers, those folks that  
8 really needed a lot of help through the whole  
9 system.

10 So generally, in this neck of the  
11 woods, there's some guarded optimism with what's  
12 to come. All of our schools have been open in  
13 the area.

14 Our four-year college has been open.  
15 Our tech school has been open. We're all just  
16 kind of waiting to get through the end of the  
17 school year to make sure everything continues on  
18 a positive pace and hope it doesn't speed back  
19 up.

20 We have had some of the new strains of  
21 COVID pop up in the area, and it seems like the  
22 people that have been infected by the new strain



1 are getting sicker than those that went through  
2 the first wave.

3 And some of those folks are getting  
4 the new strain even after they've gone through  
5 the vaccination process.

6 So COVID has yet to be seen where it  
7 takes us in that area right now. It's  
8 controllable, but a few things are changing that  
9 keep us on our toes.

10 So overall, things look positive in  
11 the area. Things at the bank look good. A lot  
12 of liquidity, like many others have addressed.

13 Something we're going to have to keep  
14 tackling. But rather have too much liquidity  
15 than not enough as the rest of the world .

16 So cautious optimism. Things look  
17 good in the area at this point. Hopefully, it'll  
18 get better in the summer.

19 And again, to the FDIC, thank you very  
20 much for the invitation to join this group. I  
21 look forward to future meetings.

22 MR. HORVAT: Good afternoon. My name

1 is Hal Horvat. I am the CEO and President of  
2 Senator Bank.

3 We are a 192-year-old mutual savings  
4 institution based in West Warwick, Rhode Island.  
5 West Warwick is primarily, originally a mill town  
6 about 12 miles south of Providence, very much  
7 blue collar work area, very densely populated.

8 We have 17 branches in Rhode Island  
9 and nearby eastern Connecticut. Nine of our  
10 branches are in Rhode Island, eight are in  
11 eastern Connecticut, and we are \$1.9 billion in  
12 assets.

13 Last year was certainly a challenging  
14 year, not just because of the pandemic but we  
15 also completed an acquisition in May of last year  
16 during the middle of the pandemic where we  
17 purchased for cash a bank in eastern Connecticut  
18 called Putnam Bank, approximately \$550 million in  
19 assets.

20 I would not recommend completing an  
21 acquisition in the middle of a pandemic. It  
22 created all kinds of challenges. But we got

1 through it fairly well.

2 In addition to the acquisition, we  
3 also opened up two new branches in Rhode Island  
4 and a loan production office.

5 In addition to that, we also did a  
6 core conversion in December, so we certainly had  
7 enough going on. But we came through it very  
8 well.

9 We had record earnings for the year.  
10 We had improved efficiency. We had record loan  
11 growth, both on the commercial side and on the  
12 residential lending side.

13 And deposit growth, and most people  
14 know across the country, has been pretty  
15 significant.

16 In terms of PPP loans, we certainly  
17 were a participant. We did over 100,000 loans  
18 for over \$100 million.

19 Gave us an opportunity to really  
20 service customers but also differentiate  
21 ourselves from the larger competition in this  
22 area.

1           We really embarked pretty quickly on  
2           it and we're pretty successful. Overall, Rhode  
3           Island, the economic conditions are kind of a  
4           mixed bag.

5           It's really the tale of two economies.  
6           Some industries continue to really struggle,  
7           certainly those in the hospitality sector.

8           In Rhode Island, we have our share of  
9           those industries tied to tourism and tied to  
10          restaurants and hotels, et cetera. They have  
11          continued to struggle.

12          We have other businesses that have  
13          really been going great guns. Anything tied to  
14          construction, et cetera.

15          Our asset quality remains very strong.  
16          Deposits remain strong. And the housing market,  
17          as most people have said, is particularly robust.

18          We've had a lot of influx of folks  
19          from cities, New York City and Boston, moving  
20          onto our coastline.

21          Properties are going sight unseen.  
22          Generally, there are bidding wars for those type

1 of properties. And as many people have  
2 mentioned, inventory is very low, at the lowest  
3 levels it's been.

4 We are a community bank. We're very  
5 proud of the fact that we have a foundation.  
6 Last year we were able to donate over \$1 million  
7 into the community.

8 It was particularly important last  
9 year because of all of the issues happening with  
10 regard to the pandemic, and we're very proud of  
11 being able to do that.

12 In terms of where we look going  
13 forward, the refinance activities continues to be  
14 very strong and we anticipate that happening  
15 throughout the year.

16 Commercial real estate is our bread  
17 and butter as well. As competition is fierce in  
18 that arena, as you can imagine.

19 A lot of banks are looking to make use  
20 of that liquidity that they have. Very  
21 competitive. Margins are very thin.

22 We've seen a lot of uptick in

1 industrial facilities and solar power in  
2 particular, which has been driving the market.

3 And we're seeing insurance companies  
4 add to that market as well, which makes it a  
5 little more competitive.

6 In terms of concerns, in Rhode Island  
7 it's a very competitive marketplace. We are  
8 overbanked.

9 Recently had four or five  
10 Massachusetts institutions that have moved into  
11 this area. And Chase has opened up 16 locations  
12 within the past year in this state.

13 And we also have three very large  
14 credit unions. So there's no lack of  
15 competition.

16 Margin pressure continues to be an  
17 issue. And in particular, the hospitality  
18 industry recoveries is very concerning because we  
19 do have a concentration in hospitality loans.

20 We have participated in deferred, a  
21 number of loans to the tune of about close to  
22 \$100 million.

1           We continue to see some of those folks  
2 struggle, and that's a concern as we head into  
3 our exam, which is July of this year.

4           Political climate in Rhode Island is  
5 not exactly the most business friendly, and  
6 that's a concern as we are a state of small  
7 businesses, primarily. We have very few Fortune  
8 500 companies.

9           But overall, I think most people are  
10 optimistic as we reopen the economy. We  
11 certainly are optimistic and feel pretty bullish  
12 on Rhode Island and eastern Connecticut.

13           It's my pleasure to be here and I  
14 really appreciate the opportunity to participate  
15 and look forward to participating in the future.  
16 Thank you.

17           MS. MESSERSCHMITT: Good afternoon  
18 Chairman McWilliams, Director Gruenberg, and all  
19 the FDIC staff and fellow bankers.

20           My name is Teri Messerschmitt. I'm  
21 the President and CEO of South Ottumwa Savings  
22 Bank in Ottumwa, Iowa, and located in Wapello

1 County, which is an agricultural community. And  
2 it's located in the southeastern part of the  
3 state.

4 Ottumwa is headquartered here, and we  
5 are 117-year-old bank. And we have about \$565  
6 million in assets.

7 The unemployment rate in Wapello  
8 County usually runs a little higher than our  
9 state average.

10 The Wapello County rate has been about  
11 5 percent, with the state average at about 3.5  
12 percent.

13 Iowa has one of the lowest  
14 unemployment rates in the country and we also  
15 have one of the highest labor participation  
16 rates.

17 And because of that, unfortunately,  
18 we've got Iowa with a declining population, and  
19 that's resulting in a shrinkage in our workforce.

20 As businesses are continuing to open  
21 up and expand their capacity, many businesses are  
22 going to need to hire more employees. And that's



1 a major concern for our state.

2 We are opening back up, like I said.  
3 The COVID situation in Iowa right now, Iowa does  
4 not require masks to be worn in public and we do  
5 not limit the size of indoor and outdoor  
6 gatherings.

7 Over 1.6 million people in Iowa have  
8 received at least one dosage of the vaccine. And  
9 that amounts to about 50 percent of our  
10 population.

11 We do have about 37 percent of our  
12 adult Iowans who are fully vaccinated. And  
13 anyone over the age of 16 is eligible for the  
14 vaccine.

15 Positivity rates are running around 5  
16 percent. It is encouraging to see some of the  
17 venues start to open back up in Iowa.

18 The Iowa State Fair was cancelled last  
19 year. They've announced that it will be held  
20 this year. And they have a few schedule of  
21 grandstand shows lined up for this year.

22 The school districts, they're still

1 really all over the board with some of them 100  
2 percent in class and some of them still 100  
3 percent online.

4 Our bank does continue to service our  
5 customers. All of our lobbies and drive ups  
6 continue to be open to serve the needs of all of  
7 our customers.

8 One of the challenges that we found  
9 from the pandemic is access to high speed  
10 internet. Approximately a third of our Iowa  
11 counties do not have reliable internet services.

12 And about 20 percent or less than 20  
13 percent of Iowans have access to affordable  
14 internet.

15 And that internet needs to be  
16 accessible. It needs to be affordable. And the  
17 state is addressing that issue.

18 And they have approved spending \$450  
19 million over the next three years on broadband.

20 I would say that 2020 was a very busy  
21 year for us in spite of COVID. I'm proud to say  
22 that we strongly supported our businesses and our

1 communities by participating in the PPP program.

2 In 2020, we did originate around 300  
3 loans, and that was for a total of about \$16  
4 million. 2021 has continued to be very busy with  
5 the PPP loans.

6 And we have processed about 550 loans  
7 and that totals about \$11 million on the second  
8 PPP funding that was approved.

9 We are very committed to continue to  
10 offer the PPP funding with all of our customers  
11 as long as the funding continues to be available.

12 The low mortgage rates also helped us  
13 significantly in 2020 with home refinances and  
14 home purchases. And we will see that continue  
15 and are continuing to see that during 2021.

16 The fee income from both the PPP  
17 program and the residential real estate programs  
18 have generated significant fee income for our  
19 bank.

20 They did that in 2020 and we see that  
21 trend continuing significantly in 2021 as well.

22 This will help our bank continue with

1 the decreasing net interest margin. The net  
2 interest margin has been and continues to be a  
3 concern for our bank.

4 Limited new loan demand in our area  
5 causes us to have about 40 percent of our assets  
6 invested in the investment portfolio.

7 We also have increased competition for  
8 existing loans due to excess competition with  
9 other financial institutions in town.

10 We have seen, like others, that  
11 there's some pretty competitive low interest  
12 rates being offered out there and for some really  
13 favorable terms.

14 The low interest rates on the new  
15 investments also hurts on our margin, as well as  
16 our existing investments that continue to mature  
17 or either get called or continue to be paid down.

18 And as a result of that, we've seen  
19 our net interest margin fall to about 2.7  
20 percent.

21 On the deposit side, we're just like  
22 most banks. We've seen our deposit base continue

1 to grow with the PPP funding and the stimulus  
2 funding.

3 Liquidity is not an issue for us, and  
4 actually is more of a challenge for us to get it  
5 invested.

6 On the loan side, we have a  
7 concentration of ag credits with the ag portfolio  
8 greater than that of most of our capital.

9 And this sector has benefited  
10 significantly during 2020 and into 2021.

11 Due to that, increased FSA payments  
12 that our farmers received and the USDA Corona  
13 Food Assistance Program, the CAP program, that  
14 has helped significantly.

15 Also, the increase in the commodity  
16 prices have benefited our ag sector very much.

17 Farm real estate land values have  
18 stayed stable as well as the farm cash rents.  
19 Crop inputs for the most parts have remained  
20 relatively flat, with the exception of  
21 fertilizer.

22 The outlook for 2021 is positive for

1 the ag sector at this time. We've still got the  
2 PPP program. We've got round three of the CAP  
3 payments and the current commodity prices.

4 Farmers have taken advantage of the  
5 current commodity prices by selling their  
6 inventories of store grain at the current levels  
7 of pricing.

8 They also are locking into some of  
9 their future pricing for some of the 2021 new  
10 crop production.

11 Our loan quality continues to be  
12 strong with very little delinquencies. All of  
13 our customers that had modifications during the  
14 year that were made are back on a paying status  
15 except for three, which will end in the next  
16 three months.

17 We continue to increase our provision  
18 for loan loss expenses with the uncertainly  
19 really of the COVID situation still ahead of us.

20 We did segregate the hotel and the  
21 restaurant sectors out of our loan portfolio, and  
22 we are allocating more of our provision expense

1 to the sectors.

2 In addition, we did place a few of  
3 those loans on our watch list. And we still  
4 continue, though, to monitor all of the sectors  
5 in our loan portfolio as we proceed with opening  
6 up of the economy and as the COVID situation  
7 continues.

8 In January this past year, we  
9 completed an operational merger with the Peoples  
10 State Bank into one data processing system.

11 Our legal merger took place about a  
12 year ago in January of 2020 and we operated two  
13 core systems for two years.

14 During that time in January, during  
15 our conversion, we also had a State of Iowa  
16 Virtual Exam that started the day after our  
17 conversion weekend.

18 We had great employees and I  
19 appreciate all their hard work to make such a  
20 smooth transition on our new conversion and also  
21 with working during the examiners during this  
22 process.

1 I also appreciate the examiners who  
2 were very helpful with providing suggestions and  
3 resources to us as we continue to fill the shoes  
4 of our long-time compliance officer who retired  
5 during 2020.

6 The exam was very efficient and we  
7 were very happy with the process.

8 I want to extend a continued thank you  
9 to the FDIC and the Iowa Department of Banking  
10 for all their system and support throughout the  
11 year.

12 Thank you very much for your time and  
13 I appreciate this opportunity.

14 MS. KEA: Teri, thank you so very much  
15 for wrapping us up at the end, and let me just  
16 say thank you to all of the members of the  
17 committee.

18 I just really appreciate your candid  
19 sharing of your observations from your  
20 communities.

21 And this is one of the main reasons  
22 why the chairman has convened this meeting, so



1 that we can hear from you all firsthand about  
2 what's going on in your communities.

3 There were common themes that we  
4 heard. Many of you talked about the impact of  
5 COVID on your operations as well as on your local  
6 community.

7 Many of you used the word guarded  
8 optimism in terms of your thinking for the  
9 future.

10 You talked about the housing market,  
11 mortgage market, labor. You talked about your  
12 experience with the PPP loans.

13 And many gave great updates on what's  
14 going on in the agricultural communities. You  
15 all gave examples of what you're doing to support  
16 your communities, or you talked about it, and  
17 that was very, very informative for us to hear.

18 And then some of you gave some  
19 feedback to us in terms of your exchange with our  
20 staff as they are conducting examinations.

21 And we heard you. We heard the  
22 compliments and we heard your continued need and

1 appreciation for collaboration and cooperation.

2 Those were just some of the many  
3 themes that I heard from all of you.

4 So I want to thank you for sharing  
5 your concerns. Thank you for talking about your  
6 challenges. And then thank you for sharing about  
7 your successes.

8 At this point, I'd like to turn it  
9 over to our FDIC staff, Shayna, Kristie, and  
10 Frank, and ask them to engage you as they give  
11 some of their observations.

12 Shayna, Kristie, and Frank.

13 MS. OLESIUK: Great. Thank you,  
14 Arleas. And I echo the thank you to all of the  
15 participants.

16 I find that hearing your information  
17 and hearing your insights is very useful for our  
18 work.

19 So I will spend a few minutes talking  
20 about our team's observations from a national  
21 viewpoint on the economy and then I will turn it  
22 over to Frank and Kristie for their regional

1 perspectives.

2 So in my view, things, the themes boil  
3 down to two main things, and these match very  
4 well with what I heard from you all.

5 First, the improving economic  
6 conditions and the resilience of our banks during  
7 the last year.

8 I agree that I would have that we  
9 would have been in a very different place one  
10 year into the pandemic, but things are actually  
11 much improved.

12 But also, continued uncertainty on  
13 what the post-pandemic economy will look like and  
14 what the implications of that is for the major  
15 lending portfolios at our banks, particularly  
16 commercial real estate, which I heard many of you  
17 mention.

18 So first on the national economy. So,  
19 economic conditions have definitely improved  
20 since we met last October.

21 GDP growth for fourth quarter 2020 was  
22 4 percent. And the current consensus forecast

1 for the full year of 2021 is 6.3 percent growth,  
2 which is very strong.

3 Of course, this is coming off of a  
4 relatively low base in 2020, and the expectations  
5 have been boosted by the fiscal stimulus.

6 And we're already seeing stronger  
7 retail sales and stronger consumer confidence in  
8 the first couple months of the year.

9 So the question of when will we reach  
10 pre-pandemic GDP levels? The consensus forecast  
11 says third quarter of this year, but some of the  
12 more positive outlooks put it at second quarter.  
13 So we're very close on an economic output basis.

14 The story's a bit different, though,  
15 for employment. And I heard from many of you  
16 here talking about improving employment. And  
17 we're certainly seeing that at the national level  
18 as well.

19 However, we still have a ways to go  
20 with the number of jobs that we still are below  
21 the February 2020 level.

22 We're still about 8 million jobs below

1 the February 2020 level. And despite the fact  
2 that we saw strong gains in February and March,  
3 that's certainly a sizeable hole to fill.

4 And it's particularly a concern for  
5 the leisure sector. The leisure sector was at  
6 the center of the labor market deterioration.

7 And we've seen strong gains in that  
8 sector, but there are still about 3 million jobs  
9 below pre-pandemic levels.

10 So still a ways to go in that sector  
11 as well.

12 The unemployment rate has come down  
13 from a peak of 15 percent now to 6 percent in  
14 March. But despite the improvement that we've  
15 seen, no region is back to pre-pandemic levels.

16 No FDIC region, that is. And  
17 unemployment remains particularly elevated in the  
18 northeast and the west.

19 So just a few more comments about the  
20 commercial real estate sector. So like many  
21 mentioned, commercial real estate remains a  
22 challenge.

1                   Many segments of CRE are facing  
2 challenges, pretty much everything except for the  
3 industrial sector which has actually benefitted  
4 from the boost in warehouse space demand and  
5 things like online shopping.

6                   One of the metrics that we pay close  
7 attention to is what property prices are doing.  
8 And we see that property prices are down about 10  
9 percent from pre-pandemic levels.

10                   And of course this is important given  
11 that this is the collateral protection for most  
12 CRE loans.

13                   So down 10 percent overall. For  
14 lodging and retail properties, prices are down 20  
15 to 25 percent, but most of that was a drop early  
16 in the pandemic. And it's been fairly flat since  
17 mid-summer.

18                   The good news, however, is, and  
19 relative to the great recession, these property  
20 price drops are not as severe.

21                   Back in the great recession, we saw  
22 commercial real estate property prices drop about

1 35 percent.

2 So in other words, things don't look  
3 that bad given the data that we see. And given  
4 the improvements in the economy, we're hoping  
5 that things continue to improve for commercial  
6 real estate as well.

7 So with that, I will turn it to Frank  
8 and Kristie.

9 MS. ELMQUIST: Hi, good afternoon.  
10 I'm a director in the Dallas region. I guess I'd  
11 start by just saying going into the pandemic, the  
12 fact (video interference) position to handle  
13 adversity, really good financial metrics,  
14 including soft capital and solid (video  
15 interference) by year end (video interference)  
16 led by the state of Mississippi, Tennessee, and  
17 Arkansas by primarily because they have a larger  
18 share of manufacturing continuing to progress  
19 really well, and I (video interference) think  
20 that's really impressive to see because the  
21 challenges were not just focused on the pandemic  
22 but we also faced some (video interference) along

1 the Gulf Coast last summer and of course historic  
2 winter storms including the big freeze in  
3 February.

4 MS. KEA: Kristie, pardon me. This is  
5 Arleas. You are dropping off at every other  
6 word. Perhaps if you turn your video off and  
7 just use your audio, that might assist. Kristie  
8 are you -- thank you.

9 MS. ELMQUIST: Okay, so can you hear  
10 me now?

11 MS. KEA: Say more. I think you  
12 dropped off at the last word, but continue,  
13 please. Kristie, I think we've lost you  
14 altogether. Are you there?

15 Frank, are you there? Could you go  
16 ahead and speak and we will try to get Kristie  
17 back on?

18 MR. HUGHES: Sure, I hope so. Can you  
19 hear me, Arleas?

20 MS. KEA: We can, yes. Thank you.

21 MR. HUGHES: Okay, great. I had a  
22 WebEx meeting earlier today and had some



1 problems, so that's good to hear.

2 So I'll be quick. I know we're over  
3 on time. It was great to hear the comments from  
4 the bankers around the country. And I think what  
5 you're going to hear me say is similar to what  
6 much of you said.

7 So by way of background, the New York  
8 region includes all states from Maine to Maryland  
9 and also includes the District of Columbia,  
10 Puerto Rico, and the Virgin Islands.

11 And of course, the region was at the  
12 center of the initial COVID-19 outbreak, with  
13 many of the states among the first to close.

14 Since last summer when I spoke in  
15 front of the Community Bank Advisory Committee,  
16 we have seen general economic improvement in the  
17 region, but at a slower pace than we've seen  
18 nationally.

19 And 2021 regional activity is  
20 projected to be slightly below U.S. forecasts.

21 Labor market recovery also trails  
22 national trends throughout most of the New York

1 region.

2 Unemployment rates are still generally  
3 higher than the U.S. level, while job gains have  
4 also trailed.

5 The slower pace of recovery in the  
6 region can be attributed to several factors, most  
7 notably the severity of the downturn at the onset  
8 of the pandemic, the public policy response, and  
9 then generally weak demographic trends that we  
10 were already experiencing here in the region  
11 before the pandemic.

12 Prior to the pandemic, banks in the  
13 region had higher concentrations of commercial  
14 real estate or CRE than other parts of the  
15 country, with concentrations especially prevalent  
16 in the multi-family sector.

17 Banks in the New York region also  
18 showed less on balance sheet liquidity. So as a  
19 result, we have been focusing supervisory efforts  
20 on risk management practices related to both  
21 these areas on our exams, visits, and outreach  
22 events.

1 CRE is showing signs of recovery in  
2 the region, although at a slower pace than the  
3 rest of the country.

4 As many have mentioned, hotels  
5 continue to struggle in the major markets in the  
6 region, with overall performance well below U.S.  
7 levels despite a significant recovery as a result  
8 of the pace of vaccinations, the warmer weather,  
9 and pent up demand.

10 Retail has seen significant recovery,  
11 though the recovery varies greatly by sector.  
12 The food and beverage category and e-retail are  
13 doing well, while restaurants, bars, and  
14 traditional retailers are still well below pre-  
15 pandemic levels.

16 So interesting data on the commuter  
17 side, just for the New York City area. Through  
18 the first week of April, it does provide us some  
19 insight into economic activity.

20 Subway ridership in the city is still  
21 65 percent below prior levels, bus ridership 50  
22 percent below, and ridership on the two major

1 commuter train services is 70 percent below prior  
2 levels.

3 But we have seen an increase in bridge  
4 and tunnel traffic that's significantly closer to  
5 prior levels, but we think some of that is offset  
6 from rail commuters taking advantage of lower  
7 traffic into the city.

8 The office space sector remains  
9 subject to uncertainty surrounding long-term  
10 trends and the acceptance of the distributed  
11 workforce model.

12 As the commuter data I mentioned  
13 indicates, work from home is still significantly  
14 affecting the region in general and New York City  
15 more specifically, with occupancy levels well  
16 below national levels.

17 On the multi-family front, data for  
18 cities like Baltimore, Hartford, Philadelphia,  
19 and Pittsburgh continue to show generally  
20 favorable dynamics, while major markets like New  
21 York City, Boston, and Washington, D.C. are  
22 forecast to lag regional and national

1 performance.

2 Rental payment metrics show some  
3 strain. Renters behind on rent in New York City  
4 and Philadelphia are above national levels, while  
5 the numbers are more favorable in Boston and  
6 Washington, D.C.

7 I know we talked quite a bit about  
8 residential real estate. So in the region,  
9 strong home price gains continue.

10 Regionally, the northeast was the only  
11 major region to see a notable divergence in home  
12 sales between urban and suburban markets, with  
13 New York and New Jersey suburban markets causing  
14 most of the divergence, as we continue to see out  
15 migration from some of our larger cities.

16 Real quick on banking conditions, in  
17 general, as Kristie said in her opening remarks,  
18 banks in the region entered the pandemic at  
19 overall strong condition with increasing levels  
20 of capital, strong asset quality, and  
21 satisfactory risk management practices and  
22 compliance management systems.

1           Banks have seen earnings negatively  
2 affected by the pandemic with strong growth in  
3 deposits that have increased balance sheets while  
4 loan yields have fallen.

5           In addition, banks have increase  
6 provisions to account for the expected increase  
7 in credit losses due to economic weaknesses.

8           Banks in the region were also very  
9 active in PPP, which did help earnings, did help  
10 offset some earnings pressure.

11           I mentioned liquidity in the region  
12 prior to the pandemic. So median deposit growth  
13 in the region significantly outpaced the national  
14 rates.

15           We saw 23 percent growth in the region  
16 versus 17 percent nationally, while loan growth  
17 was only up about 7 percent, and only slightly  
18 above the national trend.

19           The positive there is that liquid  
20 assets did increase at a faster rate in the  
21 region than the nation. Again, as I mentioned,  
22 the New York region quickly had run with lower

1 levels of liquidity.

2 The overall loan delinquency rate  
3 increased slightly but it ended 2020 just below  
4 the national rate.

5 CRE loan delinquency rate also  
6 increased slightly and also ended just above the  
7 national rate. But it still remains historically  
8 low.

9 Deferral and forbearance activity  
10 continues to decline. We're still seeing some of  
11 it, but it's declined quite a bit.

12 And we are seeing some watch list  
13 movement down the credit rating scale at our  
14 institutions, but we're not seeing material  
15 downgrades or declines in asset quality at this  
16 point.

17 We're also not seeing material  
18 downgrades or two component or composite ratings  
19 on the safety and soundness side, but along with  
20 asset quality, we'll continue to keep an eye on  
21 earnings performance.

22 We also saw few changes in compliance

1 and CRA ratings. Banks continue to do a good job  
2 meeting the needs of their customers and  
3 communities in complying with consumer protection  
4 laws.

5 At the outset of the pandemic, we did  
6 see some uptick in branch closings across the  
7 region.

8 That seems to have moderated somewhat.  
9 And we also didn't see or are not seeing a  
10 significant increase in consumer complaints.

11 So really in some way, the initial  
12 outbreak had a significant impact on the region  
13 and we continue to see that impact in industry  
14 metrics for some asset classes.

15 Liquidity levels on average have  
16 improved across the region while earnings remain  
17 a challenge.

18 And as noted, banks in general in the  
19 New York region entered the period of economic  
20 uncertainty with favorable financial metrics and  
21 satisfactory risk management and compliance  
22 programs.



1                   So I don't know if Kristie is able to  
2 get back on.

3                   MS. KEA: Frank, I think I just saw  
4 Kristie's camera on a moment ago. So, Kristie,  
5 if you are on, would you please join us? Thank  
6 you, Frank.

7                   MS. ELMQUIST: Hi, can you hear me  
8 now?

9                   MS. KEA: We can, Kristie. Thank you.  
10 Please go ahead.

11                   MS. ELMQUIST: Perfect. I'll try to  
12 be (video interference) to compliment banks in  
13 the Dallas region, not only for being resilient  
14 during the (video interference) but also as they  
15 (video interference) during the hurricane season  
16 and then an unprecedented storm event that hit us  
17 in mid-February.

18                   And as Shayna and many of the bankers  
19 have already talked about, the (video  
20 interference) in the Dallas region, the recovery  
21 is doing well, led by states that have a  
22 concentration in manufacturing.

1           So we have recovered at least our jobs  
2           and many of our sectors are doing (video  
3           interference) including housing, agriculture, and  
4           energy has rebounded as well.

5           We do still have some challenges and  
6           uncertainty with commercial real estate, and  
7           that's important to us because a good number of  
8           our (video interference) institutions in the  
9           Dallas region do have a -- or we are really  
10          paying attention to some potential challenges  
11          (video interference) particularly convention  
12          space in (video interference) areas, as well as  
13          office vacancy rates.

14          We do have some markets that are at  
15          the high end as well as high volume of  
16          construction in process. So we'll be watching  
17          that pretty closely.

18          For the bank, our banks were really  
19          well positioned going into the pandemic, and  
20          (video interference) have demonstrated resiliency  
21          and the ability to (video interference) from a  
22          financial performance perspective, we have

1 observed shifts in the balance sheet due to the  
2 high growth in deposits, mainly because of the  
3 PPP lending as well as mortgage lending.

4 Composite rating, last year we  
5 conducted over (video interference) risk  
6 management (video interference) to the composite  
7 rating.

8 That said, we have seen some liquidity  
9 ratings (video interference) to a better rating,  
10 increase in liquidity levels, but also notable  
11 improvements in funds management practices (video  
12 interference).

13 On the flip side, we have seen some  
14 (video interference), but again, not in very many  
15 of our examinations.

16 Our (video interference) component  
17 ratings are remaining relative to deferrals, but  
18 that's because I think our banks have done a very  
19 good job (video interference) --

20 MS. KEA: Kristie, this is Arleas.  
21 Pardon the interruption. We were hearing you  
22 fine and now all of a sudden we're hearing just

1 bits and pieces. Could you check --

2 MS. ELMQUIST: Am I cutting out again?

3 MS. KEA: Yes, you're cutting out. I  
4 think that we are getting the gist of much of  
5 what you're saying, but it's cutting out more and  
6 more at this point. Are you able to make any  
7 adjustment to your audio settings?

8 MS. ELMQUIST: Can you hear me now? I  
9 can just --

10 MS. KEA: It's very choppy, and in  
11 fact, Kristie, we're not -- we're hearing every  
12 other word.

13 MS. ELMQUIST: I can try changing  
14 audio to the phone connection.

15 MS. KEA: You could just try that  
16 quickly.

17 MS. ELMQUIST: I guess since I'm at  
18 the end, should we just move on? I hate to --

19 MS. KEA: Hearing you fine now. Go  
20 ahead. We're hearing you. Well, I thought we  
21 were. Kristie?

22 MS. ELMQUIST: Can you hear me?

1 MS. KEA: Yes. Now I think you're  
2 cutting out. Let me make this suggestion. Let  
3 us pause and let's see if any of the members have  
4 any questions.

5 And you might be able to, as you're  
6 making some adjustments, and I'll ask the staff  
7 to call you or chat with you as you're making  
8 some adjustments.

9 Let us see if any of the members have  
10 any questions based on what they've heard thus  
11 far.

12 To the members, any questions or  
13 comments? You can either raise your hand or you  
14 can simply turn your camera on. And I'm just  
15 checking the chat.

16 I'm not seeing any raised hands. And  
17 it could be that everybody is really ready for a  
18 comfort break.

19 We are at 3:09. Let us do this.  
20 Let's take a 10-minute break. So let us come  
21 back just shortly before 3:15, if you would, and  
22 I'll turn it over to Shannon at this time.

1                   Shannon, would you please give us  
2 instructions for the break?

3                   Shannon could be talking to Kristie.  
4 So let us break now for 10 minutes. We'll come  
5 back right, well, I said 10 minutes but, let us  
6 come back at about, why don't we say 3:20?

7                   (Whereupon, the foregoing matter went  
8 off the record at 3:10 p.m. and went back on the  
9 record at 3:20 p.m.)

10                  MS. KEA: Shannon, thank you very  
11 much. Hello, everyone, and welcome back from the  
12 break. Despite all of the slight difficulties  
13 that we've had, I think that we are all doing  
14 very good in terms of the meeting.

15                  So I appreciate everyone's patience  
16 and cooperation. Thank you very much.

17                  So I think that we are live now,  
18 Shannon. Thank you very much. We'll go ahead  
19 and get started.

20                  I'm sorry about the problems that  
21 we've had a little bit earlier in the meeting,  
22 but I think that we will still find time to make

1       sure that you all get the interaction that you  
2       need as we move forward in the agenda.

3                 I'd like to share now that on  
4       yesterday, we had a meeting of the Minority  
5       Depository Institution Subcommittee, and I do  
6       want to express my great appreciation to Gilbert  
7       Narvaez, Jr.

8                 You heard from him earlier. He serves  
9       on both this committee and the MDI committee.  
10       Gilbert and Betty, FDIC's National Director of  
11       Minority and Community Development Banking, are  
12       going to provide us with an update on yesterday's  
13       meeting.

14                I think that they will briefly  
15       summarize key points from the MDI subcommittee  
16       meeting, which will include updates on the  
17       Mission Driven Bank Fund, the FDIC's  
18       implementation of the U.S. Treasury's Emergency  
19       Capital Investment Program, as well as our FDIC  
20       MDI program.

21                So at this time, I'd like to turn it  
22       over to Betty Rudolph and then Gilbert Narvaez.

1 Thank you.

2 MS. RUDOLPH: Thank you, Arleas. I  
3 wanted to briefly remind the committee that the  
4 FDIC established the MDI subcommittee under the  
5 authority of the Advisory Community on Community  
6 Banking, the CBAC, and the Federal Advisory  
7 Committee Act, FACA, requires that the  
8 subcommittees provide advisory recommendations to  
9 the agency, to the parent committee.

10 So therefore, the MDI subcommittee  
11 actually reports directly to the CBAC to all of  
12 you and not to the FDIC. So that's why we're  
13 reporting to you today.

14 There are three goals for the MDI  
15 subcommittee, and they include serving as a  
16 source of feedback for the FDIC on strategies to  
17 fulfill our statutory goals to preserve and  
18 promote minority depository institutions, to  
19 provide a platform for MDIs to promote  
20 collaboration, partnerships, and best practices,  
21 and to identify ways to highlight the work of  
22 MDIs in their communities.



1           The MDI subcommittee is comprised of  
2 nine executives representing a diversity of types  
3 of MDIs, including African American, Hispanic,  
4 Asian and Native American Banks, and a range of  
5 business models, size, and geographic mix.

6           The nine members of the MDI  
7 subcommittee represent about 10 percent of all 95  
8 MDIs that the FDIC supervises.

9           In addition, there are three MDIs  
10 represented on the CBAC and you heard from them  
11 today, Kenneth Kelly of First Independence Bank  
12 in Detroit, Michigan, Andrew West with Eagle Bank  
13 in Polson, Montana, and Gilbert Narvaez, Jr.,  
14 with Falcon International Bank in Laredo, Texas.

15           So at this time, the MDI subcommittee  
16 doesn't have any recommendations for the FDIC,  
17 but we do want to share a brief summary of our  
18 discussions yesterday.

19           And I'll turn it over now to Gilbert  
20 who will walk you through these updates.

21           MR. NARVAEZ: Thank you, Betty.

22           During the roundtable, each MDI banker discussed

1 current banking conditions and unique issues  
2 facing their institution.

3 And interestingly enough, we heard a  
4 lot of the same conditions, themes, and issues  
5 that some of the institutions are facing after  
6 this morning's reports.

7 Many bankers discussed their cautious  
8 optimism about the pandemic and the economic  
9 outlook over the near to medium term.

10 Some general themes bankers reported  
11 included abundant liquidity due to government  
12 stimulus programs, pressure on net interest  
13 margins, some dampened loan demand, continued PPP  
14 funding and forgiveness, and in some cases, low  
15 housing inventories and higher construction  
16 costs.

17 Also at each MDI subcommittee meeting,  
18 there is an MDI spotlight segment to showcase the  
19 work of an MDI or a group of MDIs.

20 The MDI spotlight explores best  
21 practices or lessons learned that might be  
22 insightful for other MDIs.

1                   Yesterday, we heard from Robert James  
2                   II, who is the Director of Strategic Initiatives  
3                   and board member of Carver State Bank in  
4                   Savannah, Georgia.

5                   Mr. James discussed collaboration best  
6                   practices by a group of 12 black MDIs that came  
7                   together to syndicate a \$35 million loan to  
8                   refinance the Atlanta Hawk's Emory Sports  
9                   Medicine Complex.

10                  Mr. James also serves as chairman of  
11                  the National Bankers Association, and he spoke  
12                  about the MDI trade organization's emphasis on  
13                  collaboration. So that was a very interesting  
14                  presentation.

15                  We also heard an update on the  
16                  formation of the Mission Driven Bank Fund. The  
17                  FDIC hired a financial advisor and two law firms  
18                  to develop the framework, structure, and concept  
19                  of the operations of this fund that will provide  
20                  investments in about 250 eligible FDIC-insured  
21                  MDIs and community development financial  
22                  institutions.

1           The fund is designed to generate funds  
2 from corporate, philanthropic, and bank investors  
3 into MDIs and CFIs to support growth and to serve  
4 the communities.

5           Earlier this year, each of the nine  
6 executives of the MDI subcommittee and about 70  
7 executives of MDIs and CFIs in total, had the  
8 opportunity to provide their input regarding the  
9 needs of the mission driven banking sector.

10           Yesterday, we had the opportunity to  
11 review the work of the financial advisor and law  
12 firms. The presentation included several aspects  
13 that I'll briefly summarize.

14           One was the fund design consideration,  
15 including how the fund manager will balance the  
16 needs of the investors and mission driven banks.

17           Another was the investing universe and  
18 the types of asset classes the fund will  
19 consider. The conceptual portfolio design, how  
20 the investments will be sourced. And the  
21 proposed fund governments in terms of the fund.

22           The next steps in the stand up of the

1 fund, including the hiring by investors of the  
2 fund manager.

3 Another note is that the subcommittee  
4 had a briefing on the regulatory aspects of the  
5 U.S. Treasury's Emergency Capital Investment  
6 Program.

7 Since our last meeting, Congress  
8 appropriated approximately \$9 billion for  
9 treasury investments in FDIC-insured MDIs and  
10 CDFIs and credit unions that source minority and  
11 low to moderate income neighborhoods that were  
12 disproportionately affected by COVID-19 pandemic.

13 The Treasury has issued a rule  
14 outlining the program and banks are currently  
15 submitting applications.

16 Currently, we have an update on the  
17 recent MDI program initiatives. In early March,  
18 the FDIC hosted a webinar for MDIs that are not  
19 already CDFIs.

20 Congress recently provided \$3 billion  
21 for CDFIs that are serving minority and low-  
22 income communities that were disproportionately

1 affected by COVID-19 pandemic.

2 Of this amount, \$1.2 billion is set  
3 aside for CDFIs that are minority lending  
4 institutions.

5 The FDIC conducted a webinar to help  
6 MDIs understand the requirements for becoming a  
7 CDFI an accessing CDFI fund financial assistance  
8 programs.

9 The webinar was well attended and  
10 received very positive feedback.

11 Tomorrow, the FDIC will host an  
12 interagency webinar to demonstrate a new tool for  
13 MDIs and CDFIs to estimate the impact of the  
14 capital ratios of new investments coming into the  
15 mission driven bank sector.

16 These new investments include millions  
17 of dollars of direct investment from large  
18 financial institutions, the new Treasury ECIP  
19 Investment Program, the CDI grant funds, and  
20 other potential sources of funds.

21 The capital estimator tool will enable  
22 mission driven banks to create various scenarios

1 to estimate the impact of new funding on various  
2 capital ratios.

3 Finally, FDIC also updated us on  
4 training that they are developing for examiners.  
5 The training supports the FDIC's proposed  
6 statement of policy regarding minority deposit  
7 institutions that was issued for public comment  
8 last year.

9 That policy restates interagency  
10 examination standards that require examiners to  
11 recognize the distinctive characteristics and  
12 core objectives of each financial institution and  
13 to consider those unique factors when evaluating  
14 the institution's financial condition and risk  
15 management practices.

16 This includes taking into account the  
17 size and sophistication and the nature and  
18 complexity of the business activities and risk  
19 profile of each institution.

20 This concludes the report from the MDI  
21 subcommittee, and Betty and welcome any questions  
22 that you have.

1 MS. KEA: Let us just pause for a  
2 moment in case there are some questions,  
3 especially for our new members.

4 This is a very important subcommittee,  
5 and we're happy that Gilbert and Betty were able  
6 to report out to you this afternoon on our  
7 meeting yesterday.

8 Are there any questions or comments?  
9 I don't see any hands raised in the chat. If  
10 anyone would just simply like to turn their  
11 camera on and jump in, that would be fine, also.

12 Okay, Betty and Gilbert, thank you  
13 very much. I would like to move on in our  
14 agenda. One of the other consistent topics that  
15 many of you talked about involved technology,  
16 dealing with the fintechs.

17 And we're very fortunate to have  
18 FDIC's recently appoint Chief Innovation Officer  
19 Sultan Meghji with us this afternoon.

20 Sultan is a recognized expert in  
21 financial technology and he joined us, I think,  
22 Sultan, it was just about two months ago.



1           But he's going to talk about what you  
2           can expect to see going forward with regard to  
3           technology and innovation here at the FDIC.  
4           Sultan, you have the camera.

5           MR. MEGHJI: Thank you so much,  
6           Arleas. It's great to be here and thank you so  
7           much for the invitation and the opportunity to  
8           stick in and listen on and off throughout the day  
9           as I've been able to. This is absolutely  
10          fantastic.

11          For those on the committee I haven't  
12          met yet, it's great to meet you and I encourage  
13          all of you to reach out to me at your  
14          convenience. I'd love to find time to chat with  
15          each of you.

16          As Arleas said, I think Thursday is  
17          officially my two-month anniversary here. And  
18          I've gotten a lot of questions about joining and  
19          everything.

20          And I thought it'd be useful to spend  
21          a few seconds just mentioning why I'm in banking  
22          at all and why the FDIC, which is the, I grew up

1 in a cornfield in the middle of Illinois.

2 And it's that small town sense of  
3 community that's anchored by the local community  
4 bank that really drew me in initially.

5 And I have these great memories of  
6 walking to the local diner to get pie with my  
7 grandfather and I would walk by the bank. And it  
8 was a key, integral part of the community.

9 Now, obviously, the old Main Street  
10 ideals of decades ago, far too many decades ago  
11 for me, anyway, are changing a little bit.

12 And as we think about that change, the  
13 ability to come into FDIC right now and sit in  
14 this new role was an opportunity I couldn't pass  
15 up.

16 And so let me talk a little bit about  
17 what's been going on and what you're going to  
18 start hearing more and more for us.

19 And the first thing I'd say is, I, of  
20 course, am very happy to take any questions, so  
21 please throw any into the chat or be prepared or  
22 raise your hand and we'll get to it at the end of

1 my little speech here.

2 But one of the biggest things in  
3 talking to the chairman and going on my listening  
4 tour where I spoke to a number of bankers, I  
5 spoke to people throughout the ecosystem, was a  
6 couple of things.

7 Number one is that American  
8 competitiveness is something that we want to  
9 protect and expend, and that we want to do it in  
10 an inclusive way.

11 We want to open the door to thoughtful  
12 innovation. We want to be able to let the new  
13 technologies in, but do it in a thoughtful way.

14 We wanted to make things easier for  
15 people, not harder. And we wanted to have a view  
16 to the future.

17 And we've come up with a couple themes  
18 that you'll hear those of us here at FDIC speak a  
19 little bit more about, but I'm happy to summarize  
20 them for you.

21 The first is around inclusion. We  
22 need to build an inclusive, diverse, and

1 equitable future of banking here in the United  
2 States.

3 And that's not just at the consumer  
4 level, although there's a tremendous amount we  
5 can do there. And I think you guys, most of you  
6 saw the recent bank initiative, which has been a  
7 really great first step, and there's more to come  
8 in that area.

9 But also inclusivity from the  
10 perspective of minority women owned businesses.  
11 Small businesses are the backbone of this country  
12 and it's a wonderful opportunity for us to help  
13 leverage that amazing capability and do more for  
14 them.

15 The second is around resilience, and  
16 whether or not we're talking about things like  
17 the SolarWinds hacks or the Microsoft hacks or  
18 the pressures against the system from unregulated  
19 entities or the increased competition from the  
20 big banks, we need to build into this ecosystem a  
21 more resilient capability set.

22 And that's everything from

1 cybersecurity to availability to interoperability  
2 and standards.

3 I'm sure those, some of you remember  
4 last year, we put out an RFI on a standards  
5 setting organization and that work continues as  
6 well.

7 But we really do need to get to a  
8 point where we are engineering for resilience.  
9 We have to make sure that we're being thoughtful  
10 about this.

11 And it's everything from the due  
12 diligence of third-party fintechs to  
13 understanding the technical debt that exists  
14 inside the banking sector and what we can do to  
15 help clean that up.

16 The third one is around amplification.  
17 I've spent a lot of time inside of community  
18 banks and some of them very small.

19 It's just four or five people. And  
20 everybody's kind of wearing a bunch of different  
21 hats.

22 But one thing I've noticed is that a

1 lot of people are fighting the process, they're  
2 fighting technology, they're fighting their  
3 regulatory requirements.

4 And instead of being bankers and being  
5 amazing at that, they're fighting an Excel  
6 spreadsheet.

7 Now I get inside of FDIC and I see the  
8 exact same thing. I see amazing people  
9 throughout the organization, economists,  
10 examiners, people from our technology  
11 organization, our legal division, policy, and  
12 there's all this friction in their daily lives.

13 And so I think it's important for us,  
14 if we have all these amazing experts throughout  
15 the ecosystem, they should be spending (video  
16 interference) of every hour being an expert.

17 And then finally, we have to protect  
18 the future. And here's where I come back to my  
19 comment about American competitiveness globally.

20 In the face of an ascending People's  
21 Republic of China, in the face of massive global  
22 competition, in the face of competition from

1 traditionally non-competitive sectors of the U.S.  
2 economy, the American banking system has never  
3 been under more pressure than it is currently  
4 under. And there's an amazing opportunity.

5 And again, you'll hear me say this, an  
6 opportunity for us to build a banking system of  
7 the future that exceeded what we could do in the  
8 20th century, American power both domestically  
9 and globally in the 20th century sat on the back  
10 of our economic system, sat on the back of free  
11 market capitalism, and sat on the back of our  
12 banks.

13 If we're going to be the number one  
14 country in the 21st century, we have to reinvest  
15 in that. We have to refocus on that.

16 And that's what I want to do. I want  
17 to protect the future, whether or not it's  
18 against foreign actors or whether or not it's  
19 continuing to ensure that our banks are offering  
20 the best products and services, or if Mr. Musk  
21 gets that bank on Mars that he wants.

22 That bank will still have to

1 interoperate with our system. And we want to  
2 make sure there's a way for that to work, a  
3 thoughtful, seamless, safe, and secure way.

4 And we want to do all this while  
5 fundamentally being more efficient. So we have a  
6 lot of work to do.

7 And as we go through this year and  
8 next year, you'll start seeing a bunch of  
9 different programs around these four themes that  
10 I've discussed.

11 We've already got a lot of great work  
12 going on internally. We're starting to touch  
13 some places where we're trying to enhance some of  
14 the cybersecurity standards and work on finding  
15 ways to create new opportunities to work  
16 together. And you'll see more and more of that  
17 as we go through the year.

18 But most importantly, I wanted to make  
19 sure you all heard about our email address,  
20 [innovation@fdic.gov](mailto:innovation@fdic.gov).

21 This is an opportunity for us to kind  
22 of preach to the choir. If we're going to be



1 open and transparent, here's how you do it.

2 That email hits my inbox. So please  
3 do, if you have thoughts, ideas, want to engage  
4 with us, please do reach out. We would love to  
5 hear from you.

6 And so with that, I don't have  
7 anything else specifically to add here, but I  
8 will pause for a moment and see if there are any  
9 questions.

10 I don't see any, but very happy to  
11 take any if there are any. Otherwise, I will  
12 turn it back over to Arleas.

13 MS. ANDERSON: I have a question.

14 MS. KEA: Okay, let's take a moment.  
15 Yes, go ahead.

16 MS. ANDERSON: Hi, I'm Shaza Anderson,  
17 Trust Star Bank, and my question is really more  
18 generic.

19 You probably all have read that the  
20 OCC has approved the first fintech company to  
21 have a banking charter.

22 And I'm not really sure yet how it's

1 going to affect us, how it's going to affect the  
2 FDIC, or banking in general.

3 Do you have any sort of thoughts on  
4 that? It's been something that we've been  
5 bombarded with all these fintech companies.  
6 There's one every day, it seems like.

7 But to get an approval from the OCC,  
8 would that be FDIC insurance? I mean, it's a  
9 charter, it's a banking charter. So tell me a  
10 little bit about your thoughts.

11 MR. MEGHJI: Well, first off, I can  
12 only speak for myself and the FDIC. I can't  
13 really speak to the OCC at all. And certainly,  
14 some of the different things they are doing are  
15 far outside my purview.

16 But I will say I'm a big fan of  
17 innovation. I'm a big fan of innovation in the  
18 banking sector.

19 And we see across FDIC insured  
20 institutions tremendous innovation. In some  
21 cases, the bank is just being innovated.

22 In some cases, they're partnering with

1       fintechs, of which there are many thousands.

2       Make no mistake.

3                   And in some cases, it's banks working  
4       together. And I'm a big fan of that. I like  
5       seeing entities that are what I call regulatory  
6       forward.

7                   They're engaging with groups like us  
8       early and often and finding ways to work inside  
9       of the system instead of just ignoring this and  
10      just doing whatever they feel like and kind of  
11      lone wolfing it out there.

12                   So all I can say is I encourage  
13      greatly people to work with us. I hope we can  
14      continue to do that.

15                   And I look forward to seeing what  
16      innovations all of you come up with. They get me  
17      excited.

18                   MS. ANDERSON: Thank you.

19                   MR. MEGHJI: Thank you. Arleas, back  
20      you.

21                   MR. PITKIN: Actually, Sultan, Mark  
22      Pitkin from Sugar River Bank. If you don't mind

1 me, just a comment and a question.

2           So coming from the first community  
3 bank that partnered with Lending Club, who is the  
4 largest unsecured lender in the nation many, many  
5 years ago, I am very pleased to see sort of the  
6 openness toward banks now working with these  
7 fintechs, because I can assure you that back  
8 then, there wasn't the openness and  
9 transparencies with banks sort of going outside  
10 of the box.

11           But we profess, certainly as a smaller  
12 community bank in an area that didn't have a  
13 whole lot of population growth, that we had to  
14 look at different areas of innovation in order to  
15 be sustainable and survive.

16           So we have certainly come full circle  
17 with regards to do that. So I guess my question  
18 is, what are you and/or what is the FDIC doing to  
19 sort of pass your energy, your openness, and your  
20 transparency for banks thinking out of the box  
21 when it comes to examiners that come in our doors  
22 and we are sharing certain things?

1                   Is that something that is being passed  
2 down? Because if that is the case, having an  
3 open mind is going to be incredibly refreshing  
4 when banks are doing these things that you find  
5 are very helpful, thought provoking, and  
6 necessary in the future.

7                   MR. MEGHJI: Yes, that is such a great  
8 question, Mark. And you know what I've  
9 discovered in my time in this industry is that  
10 some of the most interesting innovations, the  
11 most thoughtful dialogs I've had have not been  
12 from the biggest banks out there.

13                   It's been from the community banks  
14 that are, you've got guys dirty fingernails on  
15 the street trying to sell a loan or something  
16 like that and you guys are thinking of new and  
17 interesting ways of making that case.

18                   So I'm, A, not surprised to hear what  
19 you just said, and B, excited to hear it.

20                   Two days shy of my two-month  
21 anniversary, there's only so much megaphone I've  
22 been able to cover thus far, but you'll certainly

1 see a lot more of that.

2 Tomorrow, you'll see the first in a  
3 series of new podcasts where I interview the  
4 chairman, where we have an entirely unscripted  
5 discussion, a very open and transparent one, I  
6 might add, about innovation.

7 You'll hear us talking about some of  
8 the things I've already said today. But you'll  
9 get to hear from her directly.

10 I've done three speeches today. I met  
11 with two members of Congress today. And that's  
12 kind of a normal day for me. So there's a lot of  
13 this going on. So that's number one.

14 Number two, you're going to see a lot  
15 of what I call programmatic functions. So what  
16 does that mean?

17 It means everything from tech springs  
18 to opening up to RFIs and anything we can think  
19 of.

20 And I certainly encourage anyone  
21 hearing my voice right now, if you've got an  
22 idea, I want to hear about it.

1                   And then third is, FDIC is  
2                   approximately 6,000 employees across the country  
3                   and there's going to take a little bit of time  
4                   for us to get all the messages across and the  
5                   interview across.

6                   So I would beg a little bit of  
7                   patience. But you don't bring a guy with nearly  
8                   30 years of private sector experience building  
9                   companies and transforming large institutions  
10                  from his own startups to large public equities,  
11                  infrastructures, in here to have me sit on my  
12                  hands. So don't be surprised when you hear more.

13                  MR. PITKIN: Thank you.

14                  MR. MEGHJI: Thank you.

15                  MS. KEA: Sultan, we have just a  
16                  couple more questions. First, Neil McCurry and  
17                  then Steve Hayes.

18                  MR. MCCURRY: Hi, Sultan. Neil  
19                  McCurry in Sarasota, Florida. First, welcome to  
20                  the FDIC. Your enthusiasm is refreshing on this  
21                  area.

22                  And I'm a big fan of the concept of

1 technology, but I want to get your thoughts on  
2 what really keeps me up at night when I think  
3 about banking. And I best describe that with a  
4 short story I've shared with our shareholders.

5 In the year 2000, we were introducing  
6 internet banking, which was revolutionary at the  
7 time.

8 And I told everybody how great it is,  
9 but I said be careful because right now there's a  
10 14-year-old kid living in a basement in Europe  
11 and he's trying to hack into your system.

12 So you have to be careful with it.  
13 That was 20-plus years ago. I recently said that  
14 story again.

15 I said, the difference is that 14-  
16 year-old is grown up and now works in a well-  
17 funded factory, maybe for some government that is  
18 trying to do detrimental things to our industry,  
19 our country, and our institutions.

20 We've seen core providers that have  
21 had meaningful, successful cyberattacks. I  
22 believe that a potential cyberattack on your bank



1 very well could be death by a thousand cuts, when  
2 you look at the reputational risk and everything  
3 involved.

4 And as we speak right now, someone on  
5 this panel might be in the process of someone  
6 trying to hack into their system, and we might  
7 not know about that for months or a year from  
8 now.

9 So it's scary. So how do we adopt and  
10 innovate and embrace this technology, which  
11 ultimately relies on partnering with other  
12 organizations that are now susceptible because  
13 they have access to your systems? How do we  
14 protect ourselves against these very smart, well-  
15 funded groups?

16 And how do we do that in a  
17 collaboration as opposed to, ah, they got you?  
18 As opposed to, we're all in this together and  
19 making sure that our system is safe and is  
20 perceived to be safe by the customers in the  
21 country?

22 MR. MEGHJI: Well, Neil, it's a great

1 comment and question and I like the story, too.  
2 I relate to that.

3 I would say a few things. Number one  
4 is, we are all in this together. No one bank, no  
5 one regulator, no one member of our banking  
6 system stands alone.

7 It's not a bunch of islands. We're  
8 all part of a community and so we need to act  
9 that way.

10 I'll also say that cybersecurity, like  
11 innovation, is fundamentally not primarily a  
12 technology discussion.

13 It's people, it's processing, and it's  
14 technology. And so just like any well run bank  
15 has a top focused management program, which I'm  
16 sure everyone here who runs a bank has something  
17 like that, we need to extend the definition of  
18 that.

19 We need to make sure our people are  
20 trained. We need to make sure it's communicated,  
21 we need to make sure our processes are being  
22 evaluated and continually kind of poke that.

1           We are far past the time when you  
2           implement something, you put something in place  
3           and just leave it alone for years at a time.

4           The static mainframe system's view of  
5           the world doesn't exist anymore. That's just not  
6           how it works. Say, like, batch systems.

7           I've been very fortunate for the last  
8           few years to work on something called the Fin  
9           Cyber Program at the Carnegie Endowment for  
10          International Peace.

11          It's specifically talking about how to  
12          secure the global financial system. And we have  
13          a capacity building toolkit that included, one of  
14          the first things we put out there, and I share  
15          this because it's meaningful to your question,  
16          Neil, a communications and education program,  
17          because absolutely, from every significant  
18          shareholder to your board of directors to your C  
19          suite to the most junior person in your  
20          organization, cybersecurity is something that  
21          needs to be taken very seriously and it needs to  
22          be part of the ongoing discussion.

1           So that's kind of one comment. The  
2 second is, this is such a concern that you heard  
3 me talk about resilience as our second theme, and  
4 this is absolutely part of that, SolarWinds, the  
5 Microsoft hack, the various customized Ransomware  
6 technologies and Ransomware's a service that's  
7 out there right now.

8           These are all out there and I agree  
9 with you and I can also say I agree with Chairman  
10 Powell who thinks that cybersecurity is probably  
11 the greatest threat to our banking system.

12           So I can't say it more strongly than  
13 that.

14           MR. MCCURRY: Well, thank you for that  
15 comment. Prior to you joining us, Gilbert made  
16 some comments about the committee he's on for  
17 minority institution subcommittee, and I'd  
18 recommend the FDIC consider some type of  
19 subcommittee where a group of bankers across the  
20 country work with your group as a team to address  
21 these.

22           So everybody has different

1 perspectives on it, because ultimately, we all  
2 either fail or succeed together.

3 So I think that as much as we can look  
4 like we're joined together and talk and feel that  
5 it's not a bank and a regulator relationship,  
6 it's more of, we have to do this if we're going  
7 to survive.

8 And I think that there might be some  
9 merit to that idea. And maybe you can put some  
10 deliberation to that concept.

11 MR. MEGHJI: I think that's a  
12 fantastic idea, Neil, and I'm going to ask if  
13 you've hacked my email. Can I ask that we table  
14 that and we'll get back to you very quickly?

15 MR. MCCURRY: Fantastic.

16 MR. MEGHJI: Thanks so much, Neil.

17 MS. KEA: Great. That's great. So is  
18 Steve still on? And then PJ Wharton.

19 MR. HAYES: Can you hear me?

20 MR. MEGHJI: Yes.

21 MR. HAYES: Thank so much. I  
22 appreciate it. This is Steve Hayes from South

1 Dakota.

2 Earlier you made the comment about  
3 small banks fighting technology. And out here in  
4 South Dakota, we're probably, the majority of our  
5 banks are \$50 million to \$100 million, I suppose.

6 And I agree, rural communities, we  
7 need to wear several hats and we need to embrace  
8 technology, but what else are you hearing out  
9 there?

10 Is it these people are fighting, and  
11 you just made the comment, but is it due to the  
12 education component part of it or what?

13 And I'm just curious because I know  
14 that we face that out here as well. It's a  
15 comment or question, so --

16 MR. MEGHJI: Yeah, Steve, I was just  
17 about to ask. I'll say a couple of words and you  
18 tell me if it's useful, how's that?

19 So as I said, you talk about  
20 innovation in cybersecurity as being about people  
21 and processing and technology.

22 I think if you're going to be

1 implementing technology in a bank, you've got to  
2 think about all three of those.

3           You've got to not only make sure  
4 you're getting the right technology that's fit  
5 for purpose, that's kind of the right price point  
6 and the right kind of features and all that other  
7 good stuff, and also recognize that for,  
8 especially for smaller institutions, your  
9 technology expense in many cases are after your  
10 annual interest expense, the largest expense  
11 you've got.

12           And that's a big pill to swallow  
13 sometimes. So there's a financial component  
14 there that can't be ignored.

15           I would say, though, that investing in  
16 people is absolutely where I would start. So if  
17 you say, Sultan, you're running this \$50 million,  
18 \$100 million, \$150 million bank, and just for  
19 background, I've been living in Missouri for a  
20 while now, so the kinds of banks you're talking  
21 about in South Dakota, I recognize that strongly.

22           And I would be investing in my people.

1 I would be making sure that they have the  
2 opportunities to hear about things like the Fin  
3 Cyber Program or continuing education and all of  
4 that.

5 I mean, that's a challenge we see  
6 facing the banking sector is hiring and  
7 recruiting great people, and technology is even  
8 the biggest one.

9 I mean, the second one is making sure  
10 that you're thinking about your processes. Your  
11 process that came from 20 years ago that pre-  
12 dates real time payments, you probably want to  
13 spend some time looking at that.

14 There are some amazing resources out  
15 there, whether it's other institutions or trade  
16 associations or a variety of other agencies and  
17 organizations that can support there.

18 And then the other one is, think about  
19 the strategy where you're taking the  
20 organization. I mean, if I was, if you said to  
21 me, Sultan, what tech should I use for problem X,  
22 I wouldn't know how to answer that until I



1 understood what you were trying to do with your  
2 organization, what you're trying to do. There is  
3 no one size fits all anymore.

4 MR. HAYES: Okay. Great. Thank you.

5 MR. MEGHJI: Good. Fantastic.

6 MS. KEA: Let's go to PJ.

7 MR. WHARTON: Sultan, PJ Wharton,  
8 Yampa Valley Bank in Steamboat Springs, Colorado.  
9 Yes, I think for most of us, going through COVID,  
10 we've all faced the reality that technology, tech  
11 is no longer a luxury but a requirement.

12 And with that, many of us are members  
13 of Independent Community Bankers of America.  
14 With what we went through and seeing when our  
15 core provider was down the first business day in  
16 January and I didn't have remote deposit capture  
17 and I didn't have my ATM and I didn't have online  
18 bill pay, we had lines around the bank.

19 As a result, I participated in the  
20 ICBA Thinktech Accelerator Program, which is in  
21 the great state of Arkansas, Margaret's home  
22 state, the ICBA.

1                   My question is, do you have any  
2 interaction with our friends at Independent  
3 Community Bankers of America?

4                   Again, the Thinktech Accelerator is an  
5 amazing program where by volunteering you are  
6 able to see up to 12 companies in a single day  
7 making their pitch.

8                   And I think it'd be great if there was  
9 interaction between the FDIC and the ICBA as it  
10 relates to this vital program.

11                  So I was just curios if you've had  
12 interaction yet and what your impression is.

13                  MR. MEGHJI: I have. In fact, I spoke  
14 at the event a few weeks ago. So, yes, I have.  
15 There are a number of amazing resources out  
16 there, whether it's fraternity associations or  
17 others.

18                  But no, it's fantastic. You're  
19 absolutely right. It is no longer optional.

20                  MR. WHARTON: Thank you.

21                  MS. KEA: We have a few more minutes  
22 if there are other questions or thoughts. And in

1 the meantime, Sultan, I think your email is  
2 innovation@fdic.gov. We want to make sure  
3 everybody takes that away.

4 MR. MEGHJI: Yes.

5 MS. KEA: I think I see, did I see  
6 another hand go up? Let me just double check.  
7 Actually, I don't see any more hands.

8 But I think everybody would say,  
9 Sultan, that this is the beginning of a very long  
10 conversation that will continue to go on.

11 So we just thank you very much. There  
12 will be many more opportunities. We appreciate  
13 the recommendations that have come out of this  
14 talk.

15 And I'm sure that the members will be  
16 hearing more from you and from us at the FDIC  
17 around this. So, Sultan, thank you so very much.

18 MR. MEGHJI: Thank you, Arleas, and  
19 thank you to the members for having me here  
20 today. I look forward to continuing to engage  
21 with you.

22 MS. KEA: Thank you, Sultan. So next,

1 what we'd like to do on the agenda is to provide  
2 you all with a few supervisory matter updates.

3 And we do have with us today from the  
4 Division of Risk Management Supervision, our  
5 Director, Doreen Eberley.

6 And she's joined by Rae-Ann Miller,  
7 who is our Senior Deputy Director of Supervisory  
8 Examinations, as well as John Vogel, who is  
9 Deputy Director for Operations.

10 And then they are joined by Chris  
11 Finnegan, who is from the Division of Depositor  
12 and Consumer Protection.

13 And Chris serves as the acting Deputy  
14 Director of Compliance and CRA Examinations.

15 So for Doreen and the team, I'd like  
16 to turn it over to you.

17 MS. EBERLEY: Okay, thanks so much,  
18 Arleas. Well, we do have a number of topics to  
19 cover during our supervision panel today,  
20 including an overview of our supervisory response  
21 to the pandemic, an overview of the broker  
22 deposit and interest rate restriction fund, and

1 an introduction to our streamlined consumer  
2 compliance examination pilot program.

3 John Vogel and I will start us off  
4 with an overview of the FDIC supervisory response  
5 to the pandemic.

6 And on the slide here, we've provided  
7 a link to a short video that appears on FDIC.gov  
8 that I would encourage you to take a look at  
9 after the meeting.

10 Within days of the declaration of the  
11 pandemic by the World Health Organization, we  
12 encouraged financial institutions to work with  
13 their customers and communities affected by  
14 COVID-19 and we provided them the flexibility to  
15 do so.

16 Specifically, we stated that an  
17 institution's prudent efforts to modify terms on  
18 existing loans for affected customers would not  
19 be subject to examiner criticism, and we  
20 committed to working with affected financial  
21 institutions to reduce burden when scheduling  
22 exams.

1           We also established a dedicated  
2 coronavirus webpage to house our relevant  
3 guidance, rule makings, and answers to questions  
4 frequently asked by bankers and consumers, and  
5 that's where you'll find that video that I just  
6 mentioned.

7           Couple of weeks later, we clarified  
8 that certain loan modifications made in response  
9 to COVID-19 are not troubled debt restructurings.

10           We provided flexibility to enable  
11 mortgage servicers to work with struggling  
12 consumers.

13           We also made it easier for banks to  
14 make home equity accessible to consumers by  
15 allowing for delayed receipt of appraisals and  
16 clarifying that interior inspections are not  
17 required.

18           We encouraged institutions to use  
19 their capital and liquidity buffers to support  
20 small businesses and households, and community  
21 banks delivered, playing an outsized role in  
22 pandemic-related government stimulus program,

1 like the Paycheck Protection Program, or PPP.

2 As of the second quarter of 2020,  
3 community banks held a significant 31 percent of  
4 all PPP loans, compared to 12 percent of total  
5 industry assets and 15 percent of total industry  
6 loans. Talk about punching above your weight.

7 We've supported banks' participation  
8 in PPP by arranging webinars for the SBA to  
9 answer bankers' questions, by posting responses  
10 to the most frequently asked questions on our  
11 coronavirus webpage, and by providing regulatory  
12 clarifications and temporary regulatory relief.

13 And we'll get to the question that was  
14 raised in the first session this morning about  
15 that temporary relief. We can cover that in the  
16 Q&A.

17 We moved all supervisory activities  
18 offsite. So that's another thing you mentioned  
19 earlier today, and we can talk about this in the  
20 Q&A as well.

21 For the first couple of weeks of the  
22 national emergency, we completely paused our

1 examination program to give bankers flexibility,  
2 recognizing they were busy responding to the  
3 needs of their customers, employees, and  
4 families.

5 After that, we offered additional  
6 options to pause as needed. These pauses were  
7 well received and we were happy to provide the  
8 needed flexibility.

9 Even with these significant changes to  
10 our operations, we've maintained our supervisory  
11 programs for both safety and soundness in  
12 consumer protection, and we've continued to meet  
13 all associated statutory requirements and  
14 internal goals.

15 We were able to make the pivot to  
16 offsite work quickly because of both our prior  
17 efforts to leverage technology and examinations  
18 and because of your coordination and cooperation.

19 So let me take this opportunity to say  
20 thank you.

21 We increased our communication  
22 frequency, sharing updates on the guidance we



1 were issuing and answering your questions.

2 And we used the feedback that regional  
3 directors shared from their regular meetings with  
4 state commissioners and trade associations to  
5 shape our policy response.

6 And because of that, we issued a  
7 number of rule makings and guidance statements to  
8 address temporary needs and to implement the  
9 CARES Act.

10 We provided, just as some highlights  
11 here on the slide, just a few of them.

12 We've included a link to our  
13 coronavirus webpage, where you'll find the FAQs  
14 and the pandemic-related guidance and  
15 rulemakings, including those listed here.

16 And I'll turn it over to John now to  
17 give you a more behind the scenes look at our  
18 conversion to offsite supervision. John?

19 MR. VOGEL: Thanks, Doreen. Prior to  
20 the pandemic, we had already been conducting a  
21 significant portion of our examination work  
22 offsite.

1                   And because of that, we were able to  
2 pivot very quickly to our mandatory telework and  
3 were able to conduct our exams fully offsite.

4                   We made sure that our team was  
5 equipped to work offsite, and we provided  
6 enhancements to the enterprise file exchange that  
7 facilitated the increased number and size of our  
8 electronic files.

9                   The FDIC also provided employees  
10 flexibilities with their schedule to make  
11 accommodations for the increased or changing  
12 responsibilities that our team members had.

13 Mike, next slide.

14                   We also at the beginning of the  
15 pandemic initiated a number of our continuity  
16 planning protocols.

17                   So to make sure that we had enough  
18 examiner hours to complete our examination work,  
19 we offered our examination team a leave buy-back,  
20 which was very successful.

21                   And it allowed us to complete all of  
22 our exams on time, as many mentioned.

1           We hired additional entry-level staff  
2 for conducting loan review, and also to help on  
3 our IT exams.

4           We also rehired some of the folks that  
5 had previously retired to help us train our newly  
6 hired examiners in field offices where we had a  
7 high percentage of precommissioned examiners.

8           So, off to Rae-Ann, I think.

9           MS. MILLER: Thank you very much,  
10 John. Mike, can you go to the next slide,  
11 please? Sorry, guys, I'm having a hard time  
12 here.

13           So I'm going to talk to you guys about  
14 a few highlights and recent changes to our broker  
15 deposit regulations and rate restrictions.

16           It's important to remember that the  
17 restrictions on broker deposits and interest  
18 rates do not apply to well capitalized  
19 institutions.

20           It's also helpful to know that this  
21 regulation features a lot of changes. It's hard  
22 to do it justice in the brief time we have.

1           So I'm going to do my best to cover  
2           it. But I do encourage you to review the reg,  
3           the preamble, and we've also recently posted some  
4           Q&As.

5           And if you have questions about  
6           specific arrangements, you can submit them to our  
7           dedicated mailbox and Mike, we're going to stay  
8           on this slide for just a minute.

9           Our new regulations were approved by  
10          our board in December of last year. And it  
11          became effective on April 1, 2021.

12          We also provided what we call a full  
13          compliance date, and that runs through year-end  
14          2021.

15          And the purpose for this full  
16          compliance date was to allow for those who are  
17          relying on existing staff advisory opinions and  
18          FAQs time to change their documents and systems  
19          to comply with the new rule.

20          So after January 1, 2022, those past  
21          staff opinions and the FAQs will be moved to  
22          inactive status.

1           We will also point out that with the  
2           April 1 effective date of the new regulations,  
3           banks are going to begin to report changes with  
4           the way deposits are categorized in fall reports  
5           in the June filings.

6           The call is for interagency, and there  
7           is an interagency process underway to update  
8           those instructions now.

9           So if you could please move to the  
10          next slide, Mike.

11          So this slide summarizes section 29,  
12          requirements, section 29 of the FDI Act. And it  
13          really has a broad definition of what is a  
14          deposit broker.

15          And it's important to know that the  
16          law hasn't changed. And as a very high level  
17          summary of the restrictions that work in the law,  
18          remember that well capitalized institutions are  
19          not subject to restrictions, as I mentioned,  
20          adequately capitalized banks have to apply to the  
21          FDIC for a waiver to accept broker deposits,  
22          undercapitalized banks cannot accept broker

1 deposits, and in addition, banks that are less  
2 than well capitalized are limited in the interest  
3 rates that they can offer on deposits.

4 So all of these restrictions remain in  
5 effect, but you're going to see in the next few  
6 slides, we've changed some interpretations of the  
7 law. So please move to the next slide.

8 So as you know, broker deposit is a  
9 deposit received from or facilitated by a deposit  
10 broker.

11 So we begin our analysis with  
12 determining who is a deposit broker. And we made  
13 some revisions there.

14 A deposit broker analysis is now based  
15 on the relationship between the person placing or  
16 facilitating the placement of the deposit and its  
17 customer, not the relationship between the person  
18 and the IDI.

19 And under the revised rule, if an  
20 entity has an exclusive deposit arrangement with  
21 only one bank, including one affiliate, and is  
22 not placing or facilitating the placement of

1 deposits at any other bank, it is not a deposit  
2 broker.

3           However, if the entity has a deposit  
4 arrangement with more than one bank, the entity  
5 is a deposit broker unless it's excluded under  
6 other parts of the definition of deposit broker.

7           If the entity has an exclusive deposit  
8 arrangement for one business line with one bank  
9 or places deposits at other banks in another  
10 business line, it is also a deposit broker, but  
11 may be eligible for a Primary Purpose Exception.  
12 I'm going to discuss that in a few slides.

13           And if an entity uses multiple  
14 entities, placing deposits at different banks in  
15 an effort to evade this rule, it will be  
16 classified as deposit broker.

17           So another change in the deposit  
18 broker analysis is that to be a deposit broker,  
19 the person must have a business relationship with  
20 its customers and be engaged in the business of  
21 placing or facilitating the placement of deposits  
22 as part of that relationship.

1           So the FDIC is no longer focusing on  
2 the relationship between the third party and the  
3 bank.

4           So even if the bank is paying the  
5 third party, that's not necessarily indicative,  
6 that reason alone, that would cause the deposits  
7 to be broker.

8           So the revised rule now defines  
9 facilitating the placement of deposits. And a  
10 person is facilitating the placement of deposits  
11 if the person has legal authority, contractual or  
12 otherwise, to close the account or move the  
13 customer's funds to another bank, the person is  
14 involved in negotiation or setting rates, fees,  
15 terms, or conditions for one or more specific  
16 deposit account, but that doesn't including  
17 marketing or consulting services that help a bank  
18 determine rates that are applicable to deposit  
19 accounts generally, and then the third prong is  
20 that the person engages in matchmaking.

21           Matchmaking is defined as proposing  
22 deposit allocations at or between banks based



1 upon both a particular deposit objective of a  
2 specific depositor and the particular deposit  
3 objective of specific banks.

4 And so matchmaking does not include  
5 deposits placed by a depositor's agent with a  
6 bank affiliate or with a depositor's agent, which  
7 would include depositors' subsidiaries, parents,  
8 and other affiliates.

9 Matchmaking also does not include  
10 third parties that provide administrative  
11 services as part of a deposit sweep program  
12 between a depositor broker/dealer and  
13 unaffiliated banks.

14 That is, a third party may assist in  
15 the placement of sweep deposits with unaffiliated  
16 banks, but does not propose deposit allocations.

17 So matchmaking does include an  
18 affiliated third party that meets a deposit  
19 broker definition that places deposits with  
20 assistance of another person engaging in  
21 matchmaking activities.

22 So for example, if a third party with

1 a Primary Purpose Exception sweeps deposits to  
2 unaffiliated banks, those sweep deposits would  
3 not be brokered if the same third party uses and  
4 intermediate that fits the definition of deposit  
5 broker to place the deposits at unaffiliated  
6 banks.

7 Excuse me. If the same third party  
8 uses an intermediary debt fix, the definition of  
9 deposit broker who placed deposits with  
10 unaffiliated banks, those deposits would be  
11 brokered.

12 So let's move to the next slide,  
13 please. Make sure I'm on the same slide here.  
14 Yes. Thank you, Mike.

15 So we're going to talk about the  
16 Primary Purpose Exception. We call this the PPE.  
17 So in the law, there are still nine statutory  
18 exceptions. And we created one regulatory  
19 exception to the definition of a deposit broker  
20 some time ago.

21 So the new rule has only affected  
22 interpretation of the statutory Primary Purpose

1 Exception.

2 And so remember that the Primary  
3 Purpose Exception is only applicable if an entity  
4 fits the definition of a deposit broker and no  
5 other regulatory (video interference) applies.

6 So by the statute, a Primary Purpose  
7 Exception is only permitted when the primary  
8 purpose of the agent or nominee's business  
9 relationship with its customer is not a placement  
10 of fund with depository institutions.

11 So under the revised rule, the PPE is  
12 applied separately to each business line, and the  
13 rule now includes a list of designated  
14 exceptions, we created that terminology, that  
15 automatically will receive PPE.

16 So as you see on this slide, for two  
17 of the designated exceptions for PPE. The rule  
18 has created new notice process.

19 And so an entity should submit a  
20 notice if the entity wants to provide a PPE,  
21 either under the designated exceptions, 25  
22 percent of assets test, or the enabling

1 transactions test.

2 So the 25 percent of assets test  
3 designated exception is applicable to an entity  
4 that has less than 25 percent of its total  
5 assets, if the agent or nominee has an under  
6 administration towards customers placed at  
7 depository institutions.

8 For example, a broker/dealer's sweep  
9 programs may qualify. And entities qualifying  
10 under this exception are required to submit  
11 quarterly reports to demonstrate that they  
12 continue to qualify for the PPE.

13 Now, the enabling transaction test is  
14 the other designated exception that requires a  
15 notice.

16 This test, this exception applies to  
17 entities for which 100 percent of the depositor's  
18 funds that the agent or nominee places or assists  
19 in placing at depository institutions, are placed  
20 into transactional accounts that do not pay any  
21 fees, interest, or other remuneration to the  
22 deposit.

1           For example, accounts set up by  
2 prepaid card program managers may qualify for  
3 these enabling transactions exceptions.

4           Entities qualifying under this  
5 exemption are required to submit annual  
6 certifications. Now, please move to the next  
7 slide.

8           So this slide shows the other  
9 designated exceptions, and these don't require a  
10 notice and would not be considered brokered so  
11 long as a third party is not involved in placing  
12 the deposits.

13           It's important to know that if an  
14 entity does not fit one of these PPE designated  
15 exceptions we just talked about in these two  
16 slides, it may file an application seeking to  
17 obtain a PPE.

18           For example, a situation where  
19 placement of deposits does not fit the enabling  
20 transactions designated exception, because the  
21 bank pays interest to the underlying depositor,  
22 in this case the third party or bank on behalf of

1 a third party, could submit an application if it  
2 wanted to rely on the PPE designations.

3 Two more things I wanted to talk about  
4 before I move to interest rate restrictions that  
5 are application for less than well capitalized  
6 banks.

7 There is a lot of information here,  
8 and we would refer you to our website for the  
9 notice and application filing procedures.

10 We debuted a new website on April 1,  
11 and we're also working on a more streamlined  
12 process for the notices and applications.

13 And I wanted to note that the changes  
14 in the regulations do not impact broker's fees.  
15 They are still brokered.

16 The rules also do not change our  
17 supervisory process. It is true that the changes  
18 in the regulation may mean that some deposits  
19 that are currently reported as brokered will not  
20 be reported as brokered going forward.

21 But examiners will still review the  
22 funding structured banks to the extent there's

1 concerns, including concentrations concerns.  
2 They will be noted as part of the supervisory  
3 process.

4 And the rule also doesn't affect our  
5 enforcement authorities under section 8 or  
6 section 39 of the FDI Act.

7 Now, let's go to the next slide, and  
8 we'll talk a little bit about the interest rate  
9 restrictions that are applicable for less than  
10 well capitalized banks.

11 So the revised rule also changed the  
12 interest rate restrictions. We also created a  
13 new section of our regulations, 337.7, and split  
14 out the broker deposits from the interest rate  
15 restrictions.

16 The first change is to the national  
17 rate. So the national rate has changed based on  
18 market share versus branches, and now includes  
19 credit unions in the calculation.

20 The national rate cap has also  
21 changed. So for CDs and other deposits with a  
22 maturity date, the national rate cap is the

1 higher of, one, the national rate of 75 basis  
2 points or the U.S. Treasury security rate (video  
3 interference) plus 75 basis points.

4 For non-maturity products, the weight  
5 cap is now the higher of the national rate plus  
6 75 basis points or the Fed Funds rate plus 75  
7 basis points.

8 So let's move to the next slide, and  
9 this slide is dealing with the local rate. I  
10 would say first of all, we anticipate that far  
11 fewer institutions have become less than well  
12 capitalized that will rely on the local rate  
13 because the national rate is intended to be much  
14 more flexible.

15 But the FDIC simplified the process  
16 for banks that do wish to use a local rate. So  
17 banks will no longer have to request and the  
18 addressee will no longer make high rate  
19 determinations.

20 And banks won't need to calculate  
21 averages from all IDIs in their market area and  
22 calculate a local rate cap.



1           Instead, as a local rate, the bank can  
2 offer up to 90 percent of the rate of another IDI  
3 with a physical presence in its market area is  
4 offering for local deposits.

5           As part of this local rate  
6 determination, the bank must notify their  
7 regional office that it's using a local rate,  
8 needs to recalculate the local rates monthly, and  
9 maintain records for at least two examination  
10 cycles as part of a regulation.

11           So moving to the next slide, just a  
12 point that another change affecting both national  
13 and local rates is that interpolation or  
14 extrapolation of rates for off-tenor maturities  
15 is no longer needed.

16           If there is no national rate posted  
17 and no local rate with the same maturity, the  
18 bank by regulation is required to use the next  
19 lower posted or offered maturity.

20           So moving to the next slide, I'll just  
21 cover this quickly. This is our reminder that  
22 the rate caps are not applicable to less than

1 well capitalized banks.

2 And moving to the first slide talking  
3 about non-maturity deposits. So the revised rule  
4 clarified restrictions related to the treatment  
5 of non-maturity deposits, which non-maturity  
6 deposits were contemplated when the law was  
7 written.

8 And under the law, remember that a  
9 less than well capitalized institution may not  
10 solicit deposits by offering a rate above its  
11 rate cap or accepting broker deposits.

12 So for non-maturity deposits, the rule  
13 clarified that an institution solicits a non-  
14 maturity deposit when it opens a non-maturity  
15 account, raises the rate paid on a non-maturity  
16 account existing when the institutions was last  
17 well capitalized, or credits funds for a new  
18 depositor for a non-maturity account existing  
19 when the IDI was last well capitalized.

20 So moving on to the next slide. This  
21 is talking about accepting. So an IDI that is  
22 less than well capitalized accepts a non-maturity

1 broker deposit from a particular deposit broker  
2 when they're opening any new account, non-  
3 maturity account, when the account balance  
4 exceeds the account balance at the time the  
5 institution was last well capitalized.

6 And then for agency or nominee  
7 accounts, when the institution credits any funds  
8 for a new depositor to a non-maturity account.

9 So let's move to the next slide. This  
10 is talking about institutions with a waiver. A  
11 less than well capitalized institution with a  
12 waiver to accept broker deposits may not pay  
13 interest in excess of the appropriate rate cap.

14 Again, for particular deposit broker  
15 on any new non-maturity accounts or for any  
16 amount of funds exceeding the account balance at  
17 the time the institution fell to less than well  
18 capitalized.

19 And then for agency and nominee  
20 accounts, similarly, any funds for a new  
21 depositor.

22 And so slide 25 is our list of

1 resources. I went through this very quickly, as  
2 I mentioned, but this is certainly our effort to  
3 modernize the regulations and streamline them and  
4 clarify some issues where we received a lot of  
5 questions.

6 And so as we go through this  
7 implementation, I encourage you to, like I said,  
8 look at this list of resources and look at our  
9 website.

10 And if you have any questions, please  
11 submit them through the website. We're happy to  
12 answer them.

13 So with that, I think I'm going to  
14 turn it over to Chris.

15 MR. FINNEGAN: Okay, well, thank you,  
16 Rae-Ann. And what I'm going to discuss with you  
17 all today just real quickly is to give you some  
18 insight on our reported exam on the consumer  
19 compliance side, because you might be receiving  
20 communication from us differently going forward,  
21 particularly involving how we're going to  
22 actually write and present the consumer

1 compliance findings to banks.

2 And so first, I want to say that while  
3 we are actually changing the way we do our  
4 consumer compliance report, and the reason we're  
5 doing it and testing it out in this pilot that  
6 I'm going to go over, is we're always looking for  
7 ways to improve the way we communicate with our  
8 banks, to make ourselves more efficient, and make  
9 sure, well, the biggest thing is that you get  
10 something out of that report, that the findings  
11 of the exams and any recommendations that might  
12 come out of it, we want to make sure that it is  
13 helpful to you as we go through that process.

14 So, and this is what this is going to  
15 be. And so what had happened was, we've had a  
16 kind of one standard report that we've had for a  
17 while.

18 And we got some feedback and we  
19 noticed that some of these reports were quite  
20 lengthy, even for our lower risk institutions  
21 that hadn't had much changes since the last exam.

22 So we looked at it and we decided to

1 move forward with perhaps changing the way we'll  
2 do our reports for certain low risk institutions  
3 going forward.

4 But again, with the point being to  
5 have effective communication with our  
6 institutions. So, Mike, if you could go to the  
7 next slide, please.

8 So what we're going to do, and I want  
9 to point out before I get into the things that  
10 are on this slide here, that this is, I'm just  
11 talking about the way the report's going to look,  
12 the way the findings will come back to your  
13 institution.

14 It's not going to change the way we're  
15 doing our exams. We're still going to do our  
16 consumer compliance exams the way we always have.

17 They're going to be risk scoped, where  
18 we'll focus in on the highest risk areas for  
19 potential consumer harm. That's not going to  
20 change as part of that.

21 Also what's not going to change is  
22 your CRA public evaluation. That will still be

1 the same format that we used historically.

2 This is dealing with our consumer  
3 compliance report. And so what we're going to  
4 do, we had a pilot last year that we did.

5 So some of your banks may have  
6 actually even received a streamline report back  
7 there. And so we got some feedback, both from  
8 our examiners as well as from banks that were  
9 part of the program.

10 The phase one was basically a letter  
11 that we sent to certain institutions. It wasn't  
12 really in a report format.

13 It was more of just a combined letter  
14 that we sent, a couple pages long. And the  
15 feedback that we got, we probably would want more  
16 of a report, actually, versus just a letter.

17 That was the feedback we actually got  
18 from the banks as well.

19 So what we're going to do is we're  
20 going to pilot another version of this starting  
21 with exams that start May 1 through June 30. So  
22 about a couple weeks from now, we're going to

1 start this.

2 Again, what the purpose is to have  
3 exam efficiency and more timely turnaround. We  
4 want to make sure we're getting that report out  
5 as soon after the exam as we can.

6 And we believe that this will help.  
7 But again, we also want that report to have good  
8 information in there for you. So it's a balance  
9 there that we're going to have through that.

10 Again, I want to mention that there's  
11 going to be no changes in our exam process. The  
12 way we're going to do it again is just the format  
13 of the report going forward to hopefully again be  
14 more timely, efficient, and to get the  
15 information we need to you as quickly as we can.

16 So, Mike, if you can go to the next  
17 slide, please.

18 These, I did mention there was going  
19 to be, for certain low risk institutions, this is  
20 what we're going to be using during this phase  
21 two of the pilot.

22 The ratings have to be satisfactory



1 for both compliance and CRA, no what we call the  
2 level three, those are our most severe  
3 violations, no UDAPs, anything like that when we  
4 do our standard reports, would not be eligible  
5 for a streamlined report.

6 No civil money penalties, no repeat  
7 level two violations. There could be some  
8 violations that are level two, but if there's  
9 repeat in there, it would not be eligible.

10 And if there's restitution of more  
11 than \$1,000. So those are some of the  
12 eligibility criteria that we'll have for this  
13 report going forward for this pilot. Mike, if  
14 you'd go to the next slide.

15 Again, like I mentioned earlier, it's  
16 just mainly going to be the format change on  
17 there. Our first phase, we did it as a letter.

18 This new phase, this new pilot, is  
19 actually going to look more like a report. It's  
20 going to have a cover.

21 It's going to have a compliance  
22 management description in there. There'll be a

1 transmittal letter.

2 But it will be much more concise than  
3 what our standard report would be. Again, this  
4 is for our lower risk institutions that haven't  
5 had much change since the last exam.

6 We feel that this will be a good way  
7 of still getting the exam findings out to you in  
8 an effective manner, but just in a different  
9 format. So, Mike, next slide, please.

10 So I mentioned that this was going to  
11 be a pilot. And so part of that is we'll be  
12 getting feedback from our examiners.

13 But the most important feedback, of  
14 course, that we'll have is from the bankers and  
15 the banks that participate during this couple  
16 month period that we're going to have.

17 So we have a process that we'll be  
18 asking for to see how the report is taken by the  
19 institution.

20 Does it provide enough information to  
21 the bank about the consumer compliance exam that  
22 we did?

1                   So we're going to encourage that  
2 throughout that process. And then once we get  
3 that, then we'll decide whether or not we're  
4 going to make this a permanent part of our tools  
5 that we use for our reports going forward.

6                   And we should know that hopefully some  
7 time later this summer after we get that  
8 feedback.

9                   Now, at the same time that we're doing  
10 the streamline report, we're also looking at our  
11 standard report.

12                   That is something that we have not  
13 changed in several years. So we have a project  
14 going on right now that we're looking at that to  
15 see, in the cases where it's not going to be a  
16 streamline report, is our standard report getting  
17 the feedback and communicating back to you the  
18 results of your exam, any recommendations or  
19 findings?

20                   Is it effective? And so we're looking  
21 at that as well at the same time. So once we get  
22 the feedback from the streamline report and this

1 project that we're doing for the standard report,  
2 we'll be able to see what our report's going to  
3 look like going forward.

4 So again, we always encourage to  
5 provide us any feedback. This is your report  
6 that comes out after a long process from pre-exam  
7 planning to the onsite that we do, from where  
8 we're actually looking at things during an exam.

9 We're pulling the report together.  
10 This is a key part of that written document that  
11 we provide back to you, so we want to make sure  
12 we get whatever feedback on that.

13 So that was a quick highlight. Some  
14 of you all might get this report going forward  
15 during this pilot.

16 And if we do implement this on a  
17 permanent basis, you may see this going forward.  
18 So we always ask for your feedback on that.

19 All right, Mike, I think we go to the  
20 next slide. I think now it's time for questions.

21 MS. KEA: Thank you to Doreen and the  
22 team. I would invite the members, if you have

1 any questions at this time, please either raise  
2 your hand or you can just turn your camera on.

3 MS. EBERLEY: Arleas, maybe while  
4 we're waiting I can as Bobby Bean to address the  
5 comments that were raised in the opening session  
6 on the community bank leverage ratio.

7 MS. KEA: Thank you, Doreen. Bobby?

8 MR. BEAN: Yes, can you hear me?

9 MR. EBERLEY: Yes, we can.

10 MR. BEAN: Yes, there was some  
11 questions concerning how the FDIC and the other  
12 agencies are thinking about the CBLR,  
13 particularly as there's a large amount of deposit  
14 growth and a kind of increase in PPP lending.

15 And we understand that deposit growth  
16 and participation in PPP lending has led to us a  
17 significant balance sheet growth across community  
18 banking organizations.

19 And that has a potential compliance  
20 challenge to CBLR requirement, particularly as it  
21 transitions back to 9 percent.

22 The FDIC along with the other agencies

1 will actively monitor banking conditions,  
2 including assessing balance sheet dynamics,  
3 reserve levels, and the potential strain on  
4 community banking organizations.

5 Now, we want to ensure that the CBLR  
6 framework serves to reduce regulatory burden for  
7 qualifying community banking organizations.

8 But we want to make sure that it does  
9 so in a manner that is consistent with safety and  
10 soundness principles and the goal of providing  
11 credit to household and businesses over a range  
12 of economic conditions.

13 So we will be continuing to monitor  
14 conditions and the issues as it progresses and  
15 will consider actions from there.

16 MS. KEA: There was a question from  
17 Steve Hayes. Steve, did Bobby answer your  
18 question or is there more information that you  
19 would like?

20 MR. HAYES: No, he answered my  
21 question. Can you hear me okay?

22 MS. KEA: Yes.

1                   MR. HAYES: Yes, I asked the question,  
2                   so, from my understanding now, it's considered  
3                   expired as of March 31 and you're just going to  
4                   the situation? As of today, it has expired. Is  
5                   that correct?

6                   MR. BEAN: Yes, as of today, we are  
7                   back into the transitioning provision, back to  
8                   the 9 percent, and we will continue to monitor  
9                   conditions and the situation as we move forward.

10                  MR. HAYES: Okay. Thank you.

11                  MS. KEA: Doreen, I think there was  
12                  also a question, one more question from Bruce  
13                  Lowry. Bruce?

14                  MR. LOWRY: Hello, thank you. I just  
15                  was curious, back on the broker deposit  
16                  discussion, and let me just start off by thanking  
17                  the FDIC for looking into that topic and for the  
18                  changes that were made.

19                  But I think there's some thought,  
20                  especially with some community banks, that  
21                  perhaps things didn't go far enough, and  
22                  particularly in the area of looking at the

1 national banks and the weighted portion of the  
2 deposit that they make up.

3 I don't know the exact numbers but  
4 it's somewhere in the neighborhood of 80 percent  
5 of deposits are held by the largest national  
6 banks.

7 Community banks have something like 20  
8 percent. And so that's heavily weighted. And  
9 when you really look at rate offerings by  
10 national banks versus credit unions and community  
11 banks, there's a large disparity.

12 So I was just curious if that was a  
13 topic that would ever be looked at again in  
14 something similar to that light or maybe have  
15 more comment period for banks to be able to input  
16 on that.

17 MS. MILLER: Yes, I appreciate that.  
18 We did look at those issues and we also worked  
19 with our economists, of course, on this  
20 regulation.

21 It's quite a heavy lift. The law  
22 requires a market rate and it is true that the



1 larger institutions control more of the market.

2 Make some changes based on comments  
3 received. So in my area, we added credit unions,  
4 which was a big comment.

5 And we also, the national rate is just  
6 one piece of the puzzle, right? What attaches  
7 when institutions become less than well  
8 capitalized is the rate cap.

9 And so we created additional  
10 flexibility within the rate cap of providing for  
11 the higher of the national rate plus 75 basis  
12 points or a comparable treasury rate plus 75  
13 basis points.

14 So we felt that those things combined  
15 provide a very robust way for institutions that  
16 are less than well capitalized to, within the  
17 law, compete while still being restricted.

18 There's also a much more flexible  
19 local rate cap for those institutions that wish  
20 to compete locally with specials and different  
21 types of maturities and things of that nature.  
22 So hopefully, that answered your question.

1                   MR. LOWRY: I just express that part  
2 of the concern of that comes from the definition  
3 of well capitalized is a bit subjective in an  
4 exam.

5                   I mean, you can meet the statutory  
6 numbers and still be deemed not well capitalized.  
7 So there's a subjective nature to that that could  
8 be problematic.

9                   Right now, we all have more liquidity  
10 than we need, so it's not really an issue at the  
11 moment, but --

12                  MS. MILLER: Just so you know, it  
13 should not be subjective to what well capitalized  
14 is. Well capitalized is well capitalized.

15                  It's what your capital ratios are.  
16 They're defined by regulation. There is a quirk  
17 in the PCA with respect to enforcement actions,  
18 but it is not a subjective calculation.

19                  And if you're finding subjectivity  
20 with respect to your capital calculations and  
21 your deposit, we would want to know about that  
22 because that's not appropriate.

1 MS. KEA: I think I saw one additional  
2 hand from Hal Horvat.

3 MR. HORVAT: Yes, thank you. My  
4 question is more I think for Doreen and John. I  
5 certainly agree that the FDIC did a great job  
6 when the pandemic hit, and particularly in terms  
7 of the guidance that were issued.

8 We had a great relationship with the  
9 Boston office here. They reached out to us and  
10 we had some significant conversations.

11 Since that time, or do you anticipate  
12 any further guidance happening now that we're a  
13 year into this or more than a year into this?

14 And can you give us any insight into  
15 how exams are being handled specifically with  
16 regard to asset quality?

17 Because we're now starting to see  
18 financial statements from last year showing  
19 reduced income and companies not meeting their  
20 financial covenants.

21 And just curious as to what you're  
22 seeing relative to exams and how those are being

1 treated.

2 MS. EBERLEY: Sure. I'm happy to  
3 start and I'll ask Rae-Ann to weigh in. We're  
4 not seeing significant asset quality  
5 deterioration.

6 There are certainly some. And we're  
7 seeing, as Camille noted earlier in the day, we  
8 are seeing some institutions, we're seeing some  
9 DOW rates and internal rating systems.

10 So institutions themselves are  
11 recognizing increased risk among some borrowers  
12 for some of the situations that you named.

13 And so we're seeing a little bit of  
14 that migration. Not a meaningful amount. Not  
15 anything that's leading to significant changes in  
16 composite ratings.

17 There's always a one off, but there's  
18 no trends, no discernible trends, I guess would  
19 be the best way to say it, coming from all that.

20 That said, we have to continue to look  
21 at assets the way we've always looked at assets,  
22 right?

1           You have to recognize if a loan's not  
2 going to be repaid or if you don't expect full  
3 payment, regardless of whether you're calling it  
4 a troubled debt restructuring or not, if those  
5 facts bear out, if you don't expect to get full  
6 repayment, you need to put the loan on amount  
7 accrual, you may need to take a partial charge  
8 off.

9           You may need to rework the note. And  
10 so those are the kinds of things we're hearing a  
11 little bit about from our examiners, that bankers  
12 are going through some of those conversations  
13 now.

14           We do want to update some existing  
15 guidance on commercial real estate workouts, and  
16 that's a topic interagency that we are working on  
17 that we think may be of some need later on this  
18 year or as time continues to pass.

19           But those are the sorts of things that  
20 we're talking about. And I'll ask Rae-Ann to  
21 weigh in with anything more she may have.

22           MS. MILLER: I think you did a good

1 job, Doreen. Remember, we issue guidance to you  
2 guys, but we also issue instructions to our  
3 examiners and we conduct training for our  
4 examiners.

5 We're used to examining during crises.  
6 We've had hurricanes and wildfires and things  
7 that affect local areas. This is obviously a  
8 much bigger issue.

9 So our instructions to examiners,  
10 they're publicly available. You can read them,  
11 go through them, and get an idea of what they're  
12 looking at.

13 But essentially, they're looking at  
14 risk management and risk assessment. And even in  
15 the case where loans might meet the definition of  
16 substandard or worse, there's some longer-term  
17 situations that may not improve in the term, as  
18 long as risk management is doing what they need  
19 to do to improve the situation, that's a good  
20 thing for both the bank and the borrower.

21 So that's what we instruct our  
22 examiners. We train them, we go through

1 nationwide training programs, we use scenario  
2 analysis, we return to questions, we talk in  
3 small groups with them.

4 So we do what we can to try and keep  
5 up with how things are going. But I would say  
6 one thing that really boded well, Shayna alluded  
7 to this, that we were sitting here a year ago, we  
8 thought things would have been much worse.

9 Banks went into the crisis I think  
10 with pretty strong risk management frameworks,  
11 healthy levels of capital and strong earnings.

12 And so all of those things sort of  
13 served the system very well when these troubles  
14 hit. So that's all I have to add, Doreen.

15 MS. KEA: Doreen, we do have one more  
16 question. Mark Pitkin. Mark, just checking in  
17 with you. Did you have a question?

18 MR. PITKIN: I was on mute. I am so  
19 sorry. First and foremost, I want to thank all  
20 the folks in supervision for their supportive  
21 attitudes and supportive tact toward banks the  
22 last 12 to 18 months.

1 I sit on a number of local as well as  
2 national committees and organizations and I have  
3 not spoken with one banker that wasn't basically  
4 impressed with the way that their examinations  
5 went.

6 So again, thank you so much for that.  
7 My question may or may not necessarily be to you,  
8 Doreen, but I didn't see anywhere else in the  
9 agenda to ask the question.

10 And it may be more of a policy  
11 question. And I think Sarah hit this topic. But  
12 it's the topic of these Fed accounts.

13 So this is a significant concern,  
14 certainly for myself and other local community  
15 banks, that we've worked so hard to make sure  
16 that we avail our accounts to each and every  
17 person in our rural communities and we make every  
18 effort to make sure that they have the  
19 availability to be banked.

20 And one of our biggest concerns is  
21 this discussion about sort of these competing Fed  
22 accounts. Certainly, if it's from postal



1 delivery.

2           So most of our branches, like I  
3 indicated, are in small communities, and  
4 unfortunately, right next door is the postal  
5 service.

6           So I am just wondering if someone had  
7 any thoughts, and again, Doreen, it may be you or  
8 maybe someone in supervision as it affects sort  
9 of risk, or it may be more on the policy side.

10           But what are the thoughts of the  
11 corporation with regards to the possibility of  
12 these competing Fed accounts, and how do you see  
13 that affecting community banks going forward  
14 that, again, worked so hard in order to get and  
15 retain those deposits of our localities to each  
16 and every individual?

17           MS. EBERLEY: Thanks for the question.  
18 I think I can't give you an answer to that. I  
19 can just say that the competitive landscape is  
20 always changing for community banks and there's  
21 always a new competitor around the corner.

22           And I think one of the strengths that

1 community banks bring to the table is the true  
2 focus on the community and the consumers in the  
3 community and the range of services that are  
4 provided.

5 So it's not just a depository account.  
6 It's the opportunity to create a relationship  
7 where the consumer can get borrowings, maybe  
8 other products and services from the institution,  
9 but truly that relationship with the institution  
10 for the full range of services that are available  
11 that are a real competitive strength for  
12 community banks and have been.

13 MR. PITKIN: Okay. Thank you. I just  
14 was curious as to, again, all your thoughts on  
15 community banks competing with the federal  
16 government in some of these instances. So, thank  
17 you.

18 MS. KEA: Thank you, Mark. And thank  
19 you. Let's see. Mark Pearce.

20 MR. PEARCE: Thank you. If I could  
21 just add on, Arleas, to Doreen's comments about  
22 community banks serving the banking needs of

1 their customers.

2 I wanted to just mention for this  
3 group's awareness, we have been working pretty  
4 hard here at the FDIC to help consumers be aware  
5 of their options, be part of the business with  
6 them and have an account at an insured  
7 institution.

8 So just in the last week or so, have  
9 launched what we're calling a Get Banked  
10 campaign. We have a website that is directed to  
11 consumers to help them understand what are the  
12 benefits of having a bank loan with an insured  
13 institution and help them think through what  
14 their options are related to that.

15 Many banks have been offering accounts  
16 that are low cost, without some of the fees that  
17 maybe have not been successful for people living  
18 paycheck to paycheck in the past.

19 And so now I think it's probably the  
20 best time for consumers to take a look at what  
21 options are available for them now, especially in  
22 a time when we have had a lot of federal

1 benefits, economic impact payments, and other  
2 things that are being directed to consumers and  
3 recognizing that if you have a bank account and  
4 that account is part of the tax information with  
5 the IRS, you can get your funds direct deposited  
6 into that account much quicker than you would if  
7 you're going to rely on paper checks or a card or  
8 things sent by mail.

9 So there are more benefits than ever  
10 around having an account at an insured  
11 institution. So that's something that we've been  
12 trying to do our part to increase awareness of.

13 MS. KEA: Thank you, Mark. That's  
14 very helpful information. Thank you. I don't  
15 see any additional hands.

16 And like so many of the conversations  
17 that we've started this afternoon, they are the  
18 beginning of conversations and could go on for  
19 more. But we will move on in the agenda at this  
20 time.

21 Let me just say, it does appear that  
22 we are running possibly about 10 to 15 minutes

1 behind.

2 We would like to be able to complete  
3 the other information that we have to give to  
4 you. So if you all don't mind, please forgive us  
5 if we run just a few minutes over.

6 We'll try to turn it over to the  
7 chairman for her closing remarks at about 5:10 or  
8 5:15.

9 So at this time, I'd like to present  
10 to you John Anderlik, who is our Assistant  
11 Director of National and Regional Risk Analysis  
12 from the Division of Insurance and Research.

13 And John is going to share a research  
14 update, which focuses on the FDIC's Community  
15 Bank Study and Agriculture Lending. So John, the  
16 camera is yours.

17 MR. ANDERLIK: Thanks, Arleas. So,  
18 yes, today I'm going to be discussing a couple  
19 projects from the FDIC's Division of Insurance  
20 and Research.

21 The Community Banking Study, which we  
22 published in December, and the FDIC Quarterly

1 Paper on Agriculture, which we published last  
2 month.

3 Today I'll cover both of these  
4 projects at a fairly high level. Mike, let's  
5 turn to the first slide.

6 We'll start with the Community Banking  
7 Study. The FDIC's first Community Banking Study  
8 was published in 2012.

9 That study had two primary goals, to  
10 define community banks beyond the simple asset  
11 size, such as \$1 billion, and compare the  
12 characteristics and performance of community  
13 banks with those of non-community banks.

14 That paper, a long study period from  
15 1984 to year end 2011. This study builds on  
16 several of the themes from the original study,  
17 bringing them forward through year end 2019.

18 It also includes two issues that were  
19 not covered in the original study, regulatory  
20 change and technology, and their effects on  
21 community banks.

22 I'm going to take a quick walk through

1 each of the study's six chapters today. But one  
2 thing before we get to Chapter One.

3           Though the study goes through year end  
4 2019, we felt it would be remiss if we didn't  
5 mention 2020's pandemic.

6           So each chapter includes an inset box  
7 that discusses the pandemic and its community  
8 bank effects on the issue studied. Next slide.

9           Chapter One covers the financial  
10 performance of community banks from 2012 through  
11 2019.

12           Overall, community banks have  
13 performed pretty well. We begin the chapter by  
14 showing that community have banks have reported  
15 steadily increase pre-tax ROA since the  
16 conclusion of the prior study, reaching 1.44  
17 percent in 2019, up from 1.05 percent in 2012.

18           However, similar to the conclusion  
19 that was reached in the original study, non-  
20 community banks continue to report higher  
21 earnings overall than community banks, primarily  
22 because non-community banks have a large

1 advantage of generating non-interest income.

2 But the gap in pre-tax ROAs narrowed  
3 to just 22 basis points by year end 2019, down  
4 from 43 basis points when we started this study  
5 in 2012.

6 Community banks do have two advantages  
7 of financial performance over non-community  
8 banks. First is higher net interest margins.

9 As you can see from the chart,  
10 community banks have had an advantage over non-  
11 community banks since 2010.

12 Second is credit quality, as measured  
13 by credit losses. The full year charge off rate  
14 reported by community banks reached a post-crisis  
15 low of 0.13 percent in 2019, which was 45 basis  
16 points below the rate reported by non-community  
17 banks. Let's turn the slide.

18 Chapter Two focuses on the structure  
19 of community banks. Consolidation continued  
20 between 2012 and 2019, with non-community banks  
21 consolidating at a faster rate than community  
22 banks. Consolidation was led my voluntary



1 mergers by unaffiliated institutions.

2 Two differences stand out in the  
3 examination of consolidation trends in this study  
4 versus that of the prior study.

5 First, from 2012 through 2019, the  
6 number of new banks formed each year declined to  
7 post-1984 lows.

8 Second were fewer new institutions  
9 replaced those that were acquired or closed. The  
10 rate of net consolidation increased from 3.2  
11 percent annually from 1984 to 2011 to 4.3 percent  
12 between 2012 and 2019.

13 The chart shows over two-thirds of the  
14 community banks that closed between 2012 and 2019  
15 was because of merger, failure, or other  
16 voluntary closing, did so because they were  
17 acquired by another community bank.

18 The smallest community banks were  
19 those under \$100 million in assets, were highly  
20 likely to stop operating because they were  
21 acquired by another community bank.

22 But even among community banks with \$1

1 billion to \$10 billion in assets, nearly one of  
2 every five that ceased operation did so because  
3 they were acquired by another community bank.

4 Next slide.

5 Chapter Three examines demographic  
6 change. This is an important issue to assess  
7 because as demographics change, community banks  
8 see changes in their client bases and loan  
9 demands.

10 The two major demographic factors  
11 considered in this study are median age and net  
12 migration flows.

13 True to these metrics, we looked at  
14 the counties in the highest and lowest quartiles  
15 for each metric.

16 The map shows both counties, I'm  
17 sorry, the map shows those counties that were in  
18 either the highest or the lowest quartiles for  
19 both of the measures we studied.

20 Dark blue counties are the youngest  
21 median ages and the highest net population  
22 inflows. These counties tend to be located in

1 metro areas.

2 Our study found that community banks  
3 headquartered in such counties experience faster  
4 asset and loan growth rates, are more profitable,  
5 and have larger shares of business loans than  
6 other community banks.

7 At the other end of the spectrum, the  
8 dark gold counties were in the oldest quartile  
9 and had the lowest net inflows, actual net  
10 outflows of about 0.4 percent per year. These  
11 counties tend to be rural.

12 Community banks headquartered in these  
13 areas grew more slowly and lower commercial  
14 lending portfolios. They also have higher  
15 deposit to asset ratios.

16 The chapter also includes a large  
17 inset box on rural population, which is a key  
18 topic for the dark gold counties.

19 The FDIC has published two papers on  
20 that topic since 2004. Next slide, please.

21 Chapter Four discusses three notable  
22 lending strengths of community banks. At year

1 end 2019, community banks in aggregate held small  
2 shares of the banking industry's assets and  
3 loans.

4 Just 12 percent of the total industry  
5 assets and 15 percent of total industry loans.

6 Yet community banks are key providers of CRE  
7 loans, small business loans, and agricultural  
8 loans. The next three slides cover these areas.

9 We'll start with CRE. Community banks  
10 hold 30 percent of the banking industry's CRE  
11 loans.

12 The chart shows how community bank CRE  
13 lending overall is outsized compared to their  
14 assets.

15 CRE lending is widely distributed  
16 among community banks, with almost all of them  
17 holding some amount of CRE loans and many holding  
18 substantial portfolios.

19 Community banks are active lenders to  
20 a wide range of industries, including industrial,  
21 retail, and hotels.

22 And community bank multi-family

1 lending grew in the years between 2011 and 2019.  
2 If it is the lending across industry types,  
3 community banks have been active CRE lenders  
4 across all sizes of markets as well.

5 In 2019, community banks headquartered  
6 in rural and small metro areas held more than  
7 two-thirds of CRE loans held by all banks  
8 headquartered in those small geographic areas.

9 In larger metro areas, community  
10 banks' share of loans was smaller but still  
11 material.

12 One final note on this topic, the  
13 share of community banks that the FDIC considers  
14 CRE specialists increased over the study period.

15 These CRE specialists are particularly  
16 important providers of CRE loans in small  
17 communities. Next slide, please.

18 The second area of lending strategy  
19 for community banks is small business lending.  
20 At year end 2019, community banks held 36 percent  
21 of the banking industry's small business loans.

22 During the period covered by the

1 study, community banks' share of small business  
2 loans declined per call report data.

3 You can see in the chart that non-  
4 community banks grew their business loans across  
5 loan sizes while community banks' business  
6 lending remained flat across the lending  
7 spectrum.

8 But call reports don't tell the whole  
9 story. Call reports are based on the size of the  
10 loan, not the size of the borrower.

11 In response to the 2018 FDIC Small  
12 Business Lending Survey, many bankers said their  
13 CNI loans were extended predominantly to small  
14 businesses regardless of the size of the loans.

15 This supports the widely held belief  
16 that at community banks, many CNI loans above \$1  
17 million are in fact loans to small businesses.

18 Another data source that supports that  
19 community banks continue to be active lenders to  
20 small businesses is the SBA.

21 The SBA 7(a) program guarantees loans  
22 originating up to \$5 million. Community banks'

1 share of loan originations increased from 38  
2 percent of total originations in 2012 to 46  
3 percent in 2019, and many of those loans were  
4 above the \$1 million call report threshold. Next  
5 slide, please.

6 The third area of lending strength for  
7 community banks is agricultural lending.  
8 Community banks play a key role in financing the  
9 U.S. agricultural sector, funding roughly 31  
10 percent of total U.S. farm sector debt in 2019.

11 About a half of community bank  
12 agricultural lending is held by community bank  
13 agricultural specialists, and we focus on these  
14 institutions in the chapter.

15 These banks tend to be small and  
16 rural, with a median asset size of just \$128  
17 million. 75 percent have total assets of less  
18 than \$250 million.

19 An important point we make in this  
20 chapter is that community bank agricultural  
21 specialists have shown a strong commitment to  
22 such lending over the years.

1           The chart shows that most agricultural  
2 specialists have a long history in that role. Of  
3 these institutions that were in operation from  
4 January 1990 through year old 2019, over 55  
5 percent of them were classified as an  
6 agricultural specialist in at least 28 of the 30  
7 years.

8           In addition, agricultural specialists  
9 have been community lending to farmers through  
10 cycles in the agricultural sector.

11           From first quarter 2000 to fourth  
12 quarter 2019, in only two quarters, the community  
13 bank agricultural specialists as a group saw an  
14 annual decline in aggregate agricultural  
15 production loans.

16           And they never reported a quarterly  
17 decline in aggregate farmland secure loans over  
18 that 20-year period. Next slide, please.

19           We'll turn now to Chapter Five on  
20 regulatory change. The chapter describes  
21 regulatory changes from the onset of the  
22 financial crisis in 2008 through 2019 that were



1 relevant to community banks and the effects these  
2 changes may have had on those banks.

3 As shown in Chapter One, community  
4 banks in aggregate have been performing well, but  
5 it is often said that regulatory compliance may  
6 be relatively more expensive for smaller  
7 institutions.

8 In that respect, three issues stand  
9 out in our research. First, running a small  
10 residential loan function appears to be becoming  
11 less economical over time.

12 The chart shows that the percentage of  
13 small mortgage lenders with sustained reductions  
14 in balance sheet mortgages has been increasing,  
15 especially since the crisis.

16 The chapter examines this issue under  
17 three different definitions of a small mortgage  
18 lender.

19 The other two trends, the record pace  
20 at which community banks have been exiting the  
21 industry since 2014, and what appears to be the  
22 increase in target asset size of new small banks

1 based on their initial equity, are consistent  
2 with the presence of scale economies.

3 In principle, the need for a  
4 compliance function is a potential source of  
5 scale economies. The study makes it clear that  
6 policy benefits of regulation and how well they  
7 are achieved are beyond the scope of this  
8 analysis.

9 So nothing in the chapter should be  
10 viewed as a criticism of the regulations.

11 The bottom line of the chapter is  
12 support for the idea of achieving regulatory  
13 goals while accommodating, as appropriate, the  
14 business models of community banks. Next slide,  
15 please.

16 The last chapter in this study is on  
17 community banks' use of technology, which ties in  
18 really well with the conversation you had with  
19 Sultan earlier this afternoon.

20 Community banks have adopted different  
21 technologies, including newer technologies such  
22 as mobile banking, online loan underwriting, and

1 online loan applications at different rates.

2 According to research and community  
3 banks' own descriptions of opportunities and  
4 challenges, factors such as banks'  
5 characteristics, the economic and competitive  
6 environment, and the attitudes and expectations  
7 of bank leadership, all play an important role in  
8 community banks' adoption in technologies.

9 The chapter examines how technology  
10 haves, or those with high adoptions of  
11 technology, differ from have-nots, or those with  
12 low adoption.

13 The purpose was to shed light on the  
14 potential motivators, failures, and outcomes  
15 associated with technology adoption.

16 The study uses the results from the  
17 2019 CSBS Annual Community Bank Survey. Survey  
18 responses suggest that cost is a significant  
19 challenge to technology adoption.

20 Almost half of community banks used  
21 the word cost at least one when describing  
22 challenges. As the chart shows, larger community

1 banks are more likely to have adopted technology  
2 than smaller banks.

3 Just 6 percent of community banks with  
4 less than \$100 million are considered high  
5 adopters of technology, while 70 percent of  
6 community banks with assets over \$1 billion are  
7 high adopters.

8 In addition, relative to low adopting  
9 banks, high adopting banks have a higher loan to  
10 assets ratio, had faster loan and deposit growth,  
11 face greater competition within their local  
12 markets, and had more positive outlooks on  
13 profitability, business conditions, and  
14 regulatory burdens. Next slide, please.

15 Let's turn to the FDIC Quarter article  
16 on Agriculture that was published last month. In  
17 the paper, we've taken an extended look at the  
18 U.S. agricultural sector and the condition of  
19 farm banks.

20 In the first half of the paper, we  
21 examine the unusually long boom in farm income  
22 from 2004 to 2013, the period following the boom

1 from 2014 to 2019, and then the turbulent 2020  
2 that ended up as a positive for the sector.

3 In this analysis, we focus on 12  
4 states in the upper Midwest where everything was  
5 magnified.

6 The farm income boom was more  
7 substantial in the states, as was the downturn  
8 that followed the boom.

9 In the second half of the paper, we  
10 examine how the changes in the agricultural  
11 sector affected farm bank conditions, how bankers  
12 responded, especially during the boom years, and  
13 the challenges that persist. Next slide, please.

14 While some of the chart that shows  
15 inflation adjusted U.S. net farm income going all  
16 the way back to 1960, the chart shows that two  
17 income boom periods, from 1972 through 1975 and  
18 then from 2004 through 2013.

19 The recent boom didn't reach the pique  
20 of 1973's income level, but it was far longer.  
21 During that 10-year period, U.S. net farm income  
22 averaged \$102 billion per year, well above the

1 \$77 billion annual average from 1987 to 2003.

2           During this period, the sector saw  
3 substantial price increases across several  
4 important commodities, including corn, soybeans,  
5 wheat, cattle, dairy, and hogs.

6           Production expenses for things such as  
7 fertilizer and seed increased during this time.  
8 And farmland became more expensive to rent.

9           But commodity prices rose much more  
10 than expenses, leading to the higher net farm  
11 incomes.

12           The long period of prosperity ended in  
13 2014, and strong returns incentivized heavy  
14 growing in the U.S. and around the globe, putting  
15 pressure on commodity prices.

16           By 2016, average annual prices farmers  
17 received for corn and wheat were down nearly 50  
18 percent for their needs, and prices for hogs,  
19 milk, and soybeans were down by a third.

20           Production expenses declined during  
21 this period, but slowly. The result was a large  
22 drop in farming, comes from those achieved during

1 the boom.

2 By 2019, the sector had stabilized,  
3 though at somewhat a weak level. Then 2020's  
4 pandemic initially roiled the sector with  
5 significant disruptions to food demand and supply  
6 chains.

7 Commodity prices, especially for corn,  
8 plummeted in April and May. But record  
9 governmental support combined with late in the  
10 year recoveries and export and commodity prices  
11 helped the sector achieve strong overall incomes  
12 in 2020. Next slide, please.

13 Let's turn now to farmland values.  
14 And I know a few of you mentioned that in your  
15 opening remarks.

16 Farmland represents the largest  
17 portion of most farmers' assets and net worth.  
18 You see in the chart the dramatic rise in  
19 farmland price in the 1970s that preceded the  
20 agricultural crisis of the 1980s.

21 Farmland prices dropped precipitously  
22 during the crisis and did not begin to grow again

1 until the mid-1990s.

2 Not surprisingly, farmland prices grew  
3 to record levels during the farm income boom that  
4 began in 2004.

5 In contrast to the farmland price boom  
6 in the 1970s, farmland prices did not fall  
7 beginning in 2014 when farm incomes declined.

8 The combination of low interest rates,  
9 tight supplies, and a steady demand for farmland  
10 kept farmland values relatively flat since the  
11 farm income reminded.

12 There was another big difference in  
13 the farmland price boom of the 1970s and the  
14 recent boom.

15 In the 1970s, the price gains were  
16 widespread. Farmland values in 20 states at  
17 least doubled, and another 22 states saw prices  
18 go up at least 50 percent.

19 But in the recent boom, farmland price  
20 increases were more isolated. Though farmland  
21 prices rose 81 percent overall between 2005 and  
22 2015, less than half of all states experienced a



1 run up of 50 percent or more.

2 This time, only eight states saw  
3 farmland prices more than double during the boom,  
4 and all eight of these states are what we call  
5 the upper Midwest in our paper.

6 I'll get into the upper Midwest more  
7 in the next slide, but it's the combination of  
8 three USDA economic regions, the Corn Belt, the  
9 Lake States, and the Northern Plains. Next  
10 slide, please.

11 In this chart, we focus on the upper  
12 Midwest and contrast it with the farm income  
13 performance of the other USDA economic regions.

14 This chart shows net farming incomes  
15 indexed so that the 1987-2003 average is 100.

16 The dark blue line represents the upper Midwest.

17 The bottom blue line is the aggregate  
18 of all the USDA economic regions and the shaded  
19 area marks the range of the other regions.

20 In the early 2000s when overall U.S.  
21 agricultural conditions were weak, upper Midwest  
22 states had among the lowest net incomes of the

1       USDA regions.

2                   But then during the farm income boom,  
3 incomes in the upper Midwest quickly rose and  
4 outperformed all other regions during that  
5 period.

6                   When the farm income boom ended,  
7 incomes in the upper U.S. swung again, this time  
8 downward to among the lowest in the USDA regions.

9                   As the slide shows, incomes in the  
10 upper Midwest peaked in 2011 and 2013, in which  
11 aggregate income was nearly 2.5 times its long-  
12 term pre-boom average.

13                   Incomes in the upper Midwest then fell  
14 by more than two-thirds to reach their bottom in  
15 2016.

16                   The swings in income in the upper  
17 Midwest track the swings in prices of major  
18 agricultural commodities during that time.

19                   Corn and soybeans generate the largest  
20 share of cash receipts in these 12 states, and  
21 hog and cattle production are also important.

22                   Prices for all of these commodities

1 increased significantly during the farm income  
2 boom, and then fell sharply when it ended. Next  
3 slide, please.

4 In the paper, we then turn to the  
5 condition of farm banks through the farm income  
6 boom and the subsequent downturn.

7 The FDIC has long defined farm banks  
8 as banks with 25 percent or more of their total  
9 loans concentrated in agriculture.

10 As of year end 2020, there are 1,163  
11 farm banks in the country representing about a  
12 quarter of all commercial banks.

13 The map shows where the nation's farm  
14 banks are located, and also that the majority,  
15 more than 78 percent, are headquartered in the  
16 upper Midwest.

17 It's not surprising that farm banks  
18 performed very well during the farm income boom.  
19 You may have noticed that the dates of the boom  
20 ran over the great recession.

21 Since the U.S. agricultural sector was  
22 so strong during that time, most farm banks

1 continued to report strong earnings and capital  
2 levels and low levels of past due loans.

3 An area that farm banks found  
4 challenging during the boom was loan growth.  
5 Since the sector was so flushed with cash,  
6 farmers began to pay down debt or even self-  
7 finance their operations rather than taking out  
8 bank loans.

9 Banks also had to deal with rising  
10 deposit balance during that time. Next slide,  
11 please.

12 One point we highlighted in the paper  
13 was how different the behavior of farm bankers  
14 was during the recent farm income boom compared  
15 with the 1970s boom.

16 In the 1970s, farm bankers responded  
17 to surging farmland prices by dramatically  
18 increasing lending to fund expanded farms.

19 You can see that in the left panel.  
20 Farm banks increase agricultural loan  
21 concentrations in tandem with increases in  
22 farmland values throughout most of the 1970s.

1                   It wasn't until 1979, after several  
2 years of lower farm incomes and on the cusp of  
3 the agricultural crisis, that banks reigned in  
4 their agricultural lending.

5                   Now contrast that to the more recent  
6 period shown on the right panel. The median farm  
7 bank agricultural loan concentration ratio, which  
8 was already lower than before the boom of the  
9 1970s, remained low even when farmland values  
10 soared.

11                   This was true even in the upper  
12 Midwest, where farmland values rose higher and  
13 piqued later. Part of this more muted lending  
14 reaction to the farm income boom and rising  
15 farmland values would see as many farmers self-  
16 financing, as I mentioned earlier.

17                   But farm bankers were also more  
18 cautious, not wanting to repeat the mistakes made  
19 a few decades earlier.

20                   This sentiment has been a common theme  
21 for farm bankers at outreach meetings conducted  
22 by the FDIC over the past 15 years. Next slide,

1 please.

2 My final slide of the afternoon has to  
3 do with credit conditions of farm banks. The  
4 left slide shows the past due an accrual ratios  
5 for farm banks in the upper Midwest and the rest  
6 of the country.

7 The solid lines are the 90th  
8 percentiles for both sets of banks and the dotted  
9 lines are the medians.

10 The right chart is similar, but shows  
11 the net charge off rate. You can see from the  
12 charts that credit conditions improved  
13 substantially during the two decades following  
14 agricultural crisis.

15 Then the farm income boom drove  
16 delinquencies and charge off measures to historic  
17 lows.

18 Though median delinquencies and charge  
19 offs have edged higher since 2014, they've  
20 generally remained at or below levels seen  
21 immediately before the boom.

22 Where we have seen increases is in the

1 tail of agricultural banks. The first quarter of  
2 2020, 90th percentile delinquency rate in the  
3 upper Midwest was the highest first quarter rate  
4 since 2003.

5 FDIC examiners also noted an increase  
6 in levels of carrier debt at farm banks in recent  
7 years.

8 Overall, though, farm bank credit  
9 quality has been resilient since the farm income  
10 boom ended.

11 I'll conclude my agricultural remarks  
12 with this. Even though the second half of 2020  
13 and the USDA's 2021 outlook are reasons to be  
14 cautiously optimistic about the sector, we still  
15 see some challenges for borrowers.

16 For one, overall debt levels are very  
17 high, but this area so far has been moderated by  
18 low interest rates.

19 In addition, a subset of borrowers,  
20 what USDA refers to as high leverage borrowers,  
21 remains at risk.

22 It's too early to tell if a strong

1 2020 will be enough to bring these farmers to a  
2 strong financial position.

3 And with that, it's 5:07 Eastern time.  
4 And I can take any questions you might have.

5 MS. KEA: Thank you, John. If you all  
6 have one or two questions, we have time for that.  
7 Okay, John, I think that your information does  
8 contain some contact information for you.

9 So we want to thank you for that very  
10 informative presentation.

11 MR. ANDERLIK: Thank you.

12 MS. KEA: Let me just turn quickly,  
13 and as I've said, we've started so many  
14 conversations that could go on and on, but we  
15 have come to the end of our, and we are fairly  
16 late in the day.

17 I would like to turn first to Director  
18 Gruenberg just to see if you have any thoughts  
19 that you'd like to share before we close.

20 DIRECTOR GRUENBERG: Thank you,  
21 Arleas. Almost everybody, I'll be very brief.  
22 It's been a long afternoon.



1 I just want to thank you for your  
2 participation. This committee has now been in  
3 existence for quite a while and has really proven  
4 itself to be a valuable asset to the FDIC and our  
5 supervision of community banks.

6 We are the lead federal supervisor for  
7 the majority of community banks. And community  
8 banking in many ways is central to the mission of  
9 the FDIC.

10 And you and this committee really have  
11 contributed in a meaningful way to our ability to  
12 do our job, never more so than during this  
13 pandemic.

14 So just wanted to say thanks to your  
15 participation today. Look forward to the next  
16 meeting of this group.

17 And really, thank you for your  
18 service, both to the FDIC and to your  
19 communities. Arleas, thanks a lot.

20 MS. KEA: Thank you, Director  
21 Gruenberg. I'd like to now move to Madam  
22 Chairman and ask you to give us some closing

1        comments.

2                    CHAIRMAN MCWILLIAMS: Thank you so  
3 much, Arleas. I'll be very, very brief. Thank  
4 you all. Your time has been exceptionally  
5 valuable to us, as has your feedback.

6                    Before we adjourn, I'd like to thank  
7 two people whose terms on the committee came to a  
8 close last month.

9                    Dick Beshear, Chairman of the Board of  
10 First Security Bank and Trust Company in Oklahoma  
11 City, Oklahoma, and Cathy Stuchlik, Chairman and  
12 President of Clackamas County Bank in Sandy,  
13 Oregon.

14                    On behalf of everyone in the FDIC, I  
15 would like to thank Dick and Cathy for the time  
16 and effort they devoted to this committee. I  
17 wish them all the best and look forward to seeing  
18 the rest of you in July.

19                    Thank you so much and I hope you can  
20 get some rest after a very long video meeting.  
21 Thank you. Bye bye.

22                    MS. KEA: Thank you, Madam Chairman.

1 Thank you to all of our members. We'll see you  
2 in July. Bye bye.

3 (Whereupon, the meeting in the above-  
4 entitled matter was concluded at 5:10 p.m.)

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

<b>A</b>		
<b>ABA</b> 57:14	<b>act</b> 128:7 154:8 169:9 173:12 183:6	<b>advisor</b> 131:17 132:11
<b>ability</b> 122:21 138:13 241:11	<b>acting</b> 164:13	<b>advisory</b> 1:3 3:4 4:6,7 36:22 46:17 113:15 128:5,6,8 172:17
<b>able</b> 21:12 23:15 34:20 36:1 39:17 41:8 56:8 57:8 70:12 72:2 83:8 93:6,11 121:1 124:6 125:5 136:5 137:9 139:12 149:22 162:6 168:15 170:1,3 196:2 200:15 213:2	<b>action</b> 78:22	<b>Affairs</b> 1:16
<b>ably</b> 17:5	<b>actions</b> 198:15 202:17	<b>affect</b> 146:1,1 183:4 206:7
<b>above-</b> 243:3	<b>active</b> 41:2 47:15 56:16 67:17 87:9 118:9 220:19 221:3 222:19	<b>affiliate</b> 174:21 177:6
<b>absolutely</b> 137:9 155:17 156:4 159:16 162:19	<b>actively</b> 76:17 198:1	<b>affiliated</b> 177:18
<b>abundant</b> 130:11	<b>activities</b> 78:21 79:8 93:13 135:18 167:17 177:21	<b>affiliates</b> 177:8
<b>academic</b> 78:12	<b>activity</b> 11:12 15:5,8 18:20 43:10 45:12 50:15 62:6 77:7 86:17 113:19 115:19 119:9	<b>afford</b> 43:5 82:18 83:8
<b>accelerated</b> 69:20	<b>actors</b> 143:18	<b>affordable</b> 73:4 82:20 98:13,16
<b>Accelerator</b> 161:20 162:4	<b>actual</b> 219:9	<b>African</b> 129:3
<b>accept</b> 17:2 173:21,22 187:12	<b>adapting</b> 87:5	<b>aftermath</b> 8:4
<b>acceptance</b> 116:10	<b>add</b> 94:4 145:7 150:6 207:14 210:21	<b>afternoon</b> 4:3 9:7 10:13 13:1 18:11 28:3 46:10 51:10 58:9 74:9 79:13 89:22 95:17 111:9 136:6,19 212:17 226:19 238:2 240:22
<b>accepted</b> 16:6	<b>added</b> 201:3	<b>ag</b> 32:16 45:16 53:6,20 53:22 59:11,19 65:21 101:7,7,16 102:1
<b>accepting</b> 186:11,21	<b>addition</b> 65:22 69:13 91:2,5 103:2 118:5 129:9 174:1 224:8 228:8 239:19	<b>age</b> 13:22 19:4 97:13 218:11
<b>accepts</b> 186:22	<b>additional</b> 34:9 38:19 53:5 168:5 171:1 201:9 203:1 212:15	<b>ages</b> 35:15 160:16 197:12,22
<b>access</b> 98:9,13 153:13	<b>address</b> 144:19 156:20 169:8 197:4	<b>agency</b> 128:9 187:6,19
<b>accessible</b> 86:4 98:16 166:14	<b>addressed</b> 89:12	<b>agenda</b> 7:15 127:2 136:14 164:1 208:9 212:19
<b>accessing</b> 134:7	<b>addressee</b> 184:18	<b>agent</b> 177:5,6 179:8 180:5,18
<b>accommodated</b> 54:6	<b>addressing</b> 18:1 98:17	<b>ages</b> 218:21
<b>accommodating</b> 64:14 226:13	<b>adequate</b> 17:18	<b>aggregate</b> 220:1 224:14 224:17 225:4 233:17 234:11
<b>accommodations</b> 170:11	<b>adequately</b> 173:20	<b>aggressive</b> 48:6
<b>accomplish</b> 39:17	<b>adjourn</b> 242:6	<b>ago</b> 8:3 12:1 22:15,16 23:13 29:14 37:19 55:8 56:7 62:5 68:12 73:21 103:12 121:4 136:22 138:10,10 148:5 152:13 160:11 162:14 178:20 207:7
<b>account</b> 20:12 118:6 135:16 176:12,16 186:15,16,18 187:2,3 187:3,4,8,16 210:5 211:6 212:3,4,6,10	<b>adjust</b> 84:16,17	<b>agree</b> 107:8 156:8,9 158:6 203:5
<b>accounts</b> 176:19 180:20 181:1 187:7 187:15,20 208:12,16 208:22 209:12 211:15	<b>adjusted</b> 20:11 229:15	<b>agreement</b> 52:18
<b>accrual</b> 205:7 238:4	<b>adjusting</b> 76:4	<b>agreements</b> 44:4
<b>achieve</b> 231:11	<b>adjustment</b> 124:7	<b>agricultural</b> 3:18 53:4 72:5,5 96:1 105:14 220:7 223:7,9,12,13 223:20 224:1,6,8,10 224:13,14 228:18 229:10 231:20 233:21 234:18 235:21 236:20 237:3,4,7 238:14
<b>achieved</b> 11:21 226:7 230:22	<b>adjustments</b> 125:6,8	
<b>achieving</b> 226:12	<b>administration</b> 25:8 180:6	
<b>acknowledge</b> 78:11	<b>administrative</b> 177:10	
<b>acquire</b> 52:18	<b>adopt</b> 5:8 153:9	
<b>acquired</b> 12:10 52:11 217:9,17,21 218:3	<b>adopted</b> 226:20 228:1	
<b>acquisition</b> 55:17 90:15 90:21 91:2	<b>adopters</b> 228:5,7	
	<b>adopting</b> 228:8,9	
	<b>adoption</b> 227:8,12,15 227:19	
	<b>adoptions</b> 227:10	
	<b>adult</b> 97:12	
	<b>advantage</b> 13:17 54:7 102:4 116:6 216:1,10	
	<b>advantages</b> 216:6	
	<b>adversely</b> 17:14 50:8	
	<b>adversity</b> 111:13	
		<b>239:1,11</b>
		<b>agriculture</b> 45:1,2,9 79:21 122:3 213:15 214:1 228:16 235:9
		<b>ah</b> 153:17
		<b>ahead</b> 27:22 66:17 69:1 69:10 102:19 112:16 121:10 124:20 126:18 145:15
		<b>Alaska</b> 18:14 19:2 21:12
		<b>Alaskan</b> 20:14,20
		<b>Alaskan's</b> 19:5
		<b>albeit</b> 7:8
		<b>ALCO</b> 63:12
		<b>alert</b> 19:6
		<b>alike</b> 71:2
		<b>all-</b> 48:3
		<b>all-time</b> 14:13 21:2 83:18
		<b>allocating</b> 102:22
		<b>allocations</b> 176:22 177:16
		<b>allow</b> 172:16
		<b>allowance</b> 17:17 20:11 25:16,19 77:20
		<b>allowed</b> 76:13 170:21
		<b>allowing</b> 18:7 31:16 166:15
		<b>alluded</b> 70:22 207:6
		<b>altogether</b> 112:14
		<b>amazing</b> 57:13,18 74:15 140:13 142:5,8 142:14 143:4 160:14 162:5,15
		<b>America</b> 29:18 161:13 162:3
		<b>American</b> 6:5 129:3,4 139:7 142:19 143:2,8
		<b>ammo</b> 44:21
		<b>amount</b> 19:18 25:18 41:2,4 134:2 140:4 187:16 197:13 204:14 205:6 220:17
		<b>amounts</b> 26:4 42:18 68:17 97:9
		<b>amplification</b> 141:16
		<b>analysis</b> 9:19 68:13 174:11,14 175:18 207:2 213:11 226:8 229:3
		<b>anchored</b> 11:14 138:3
		<b>and/or</b> 148:18
		<b>Anderlik</b> 2:13 3:19 213:10,17 240:11
		<b>Anderson</b> 1:16 10:8,10 10:12,13,16 145:13 145:16,16 147:18

**Andrew** 1:20 7:2 41:22  
129:12  
**anniversary** 137:17  
149:21  
**announce** 27:3  
**announced** 12:12 52:17  
97:19  
**announcement** 29:10  
29:13  
**annual** 159:10 181:5  
224:14 227:17 230:1  
230:16  
**annually** 66:1 217:11  
**answer** 160:22 167:9  
188:12 198:17 209:18  
**answered** 198:20  
201:22  
**answering** 169:1  
**answers** 166:3  
**anticipate** 54:12 93:14  
184:10 203:11  
**anticipated** 68:12  
**Antonio** 47:7  
**anybody** 44:17  
**anymore** 43:6 155:5  
161:3  
**anyway** 67:6 73:9  
138:11  
**apologize** 28:1  
**appear** 54:16 58:13  
212:21  
**appears** 165:7 225:10  
225:21  
**applaud** 38:12  
**applicable** 176:18  
179:3 180:3 183:9  
185:22  
**application** 181:16  
182:1,5,9  
**applications** 12:5 16:7  
87:6 133:15 182:12  
227:1  
**applied** 179:12  
**applies** 179:5 180:16  
**apply** 34:5,12 40:4  
171:18 173:20  
**appoint** 136:18  
**appointed** 59:2  
**appointments** 54:7  
60:5  
**appraisals** 166:15  
**appreciate** 4:12 22:4,5  
36:17 46:8 58:7 65:6  
71:10 74:16,18 78:3  
95:14 103:19 104:1  
104:13,18 126:15  
157:22 163:12 200:17  
**appreciation** 106:1

127:6  
**approach** 48:13 68:18  
78:4  
**approaching** 47:1  
**appropriate** 5:3 6:1  
187:13 202:22 226:13  
**appropriated** 133:8  
**approval** 12:14 52:20  
146:7  
**approved** 52:21 98:18  
99:8 145:20 172:9  
**approximated** 56:20  
**approximately** 25:13  
25:17 40:15,17 55:15  
90:18 98:10 133:8  
151:2  
**April** 1:8 13:21 115:18  
172:11 173:2 182:10  
231:8  
**area** 6:5 8:20 18:8 20:6  
21:8 22:21,22 23:1  
26:9 30:21 33:13 37:4  
53:5 54:13 62:17  
72:21 76:1 79:1,20  
81:17,19 82:13 88:13  
88:21 89:7,11,17 90:7  
91:22 94:11 100:4  
115:17 140:8 148:12  
151:21 184:21 185:3  
199:22 201:3 221:18  
223:6 233:19 236:3  
239:17  
**areas** 30:17 32:22 47:7  
47:11 48:4,8,10 49:3  
50:5 54:14 76:13 84:9  
84:21 114:21 122:12  
148:14 190:18 206:7  
219:1,13 220:8 221:6  
221:8,9  
**arena** 93:18  
**Arkansas** 7:2 66:6,9,20  
67:9,16 68:2,7 111:17  
161:21  
**Arkansas-based** 65:20  
**Arleas** 1:15 7:11,19 9:4  
10:14 46:15 106:14  
112:5,19 123:20  
128:2 137:6,16  
145:12 147:19 163:18  
164:18 197:3 210:21  
213:17 240:21 241:19  
242:3  
**arrangement** 174:20  
175:4,8  
**arrangements** 172:6  
**arranging** 167:8  
**article** 228:15  
**ascending** 142:20

**Asian** 129:4  
**aside** 68:16 134:3  
**asked** 38:14 56:11  
166:4 167:10 199:1  
**asking** 194:18  
**aspects** 132:12 133:4  
**assess** 5:3 218:6  
**assessing** 198:2  
**assessment** 206:14  
**asset** 4:17 16:21 17:11  
25:20 68:8 75:5 77:16  
92:15 117:20 119:15  
119:20 120:14 132:18  
203:16 204:4 214:10  
219:4,15 223:16  
225:22 241:4  
**assets** 11:21 13:7 16:18  
17:15,16 18:16 42:3  
59:8 60:17 66:8 68:4  
71:20 90:12,19 96:6  
100:5 118:20 167:5  
179:22 180:2,5  
204:21,21 217:19  
218:1 220:2,5,14  
223:17 228:6,10  
231:17  
**assist** 49:15,21 112:7  
177:14  
**assistance** 41:3 45:15  
61:12 101:13 134:7  
177:20  
**Assistant** 213:10  
**assisting** 15:20  
**assists** 180:18  
**Associate** 9:17  
**associated** 168:13  
227:15  
**Association** 30:6  
131:11  
**associations** 57:6,14  
160:16 162:16 169:4  
**assure** 148:7  
**astounding** 16:17  
**Atlanta** 38:12 131:8  
**ATM** 161:17  
**attaches** 201:6  
**attempt** 58:7  
**attended** 134:9  
**attention** 110:7 122:10  
**attentive** 8:19  
**attitudes** 207:21 227:6  
**attributed** 48:5 114:6  
**audio** 9:9 18:21 31:21  
31:22 42:20,21 43:9  
45:7 112:7 124:7,14  
**Austin** 47:7  
**authorities** 183:5  
**authority** 128:5 176:11

**automatically** 44:8  
179:15  
**avail** 208:16  
**availability** 141:1  
208:19  
**available** 14:22 40:22  
54:20 99:11 206:10  
210:10 211:21  
**average** 14:5,7 16:4  
17:22 40:14,17 73:16  
76:19 96:9,11 120:15  
230:1,16 233:15  
234:12  
**averaged** 229:22  
**averages** 75:13 184:21  
**aware** 63:22 211:4  
**awareness** 211:3  
212:12

---

**B**


---

**B** 149:19  
**back** 8:2 13:14 22:16  
24:21 32:12 34:13  
41:20 51:1 52:1 60:2  
60:2 65:2 69:6 80:16  
84:2,7,22 88:18 97:2  
97:17 102:14 109:15  
110:21 112:17 121:2  
125:21 126:5,6,8,11  
142:18 143:9,10,11  
145:12 147:19 148:7  
157:14 190:12 191:6  
195:17 196:11 197:21  
199:7,7,15 229:16  
**backbone** 140:11  
**background** 113:7  
159:19  
**bad** 39:5 111:3  
**bag** 92:4  
**balance** 16:9 25:6,11  
62:21 63:5 83:10  
114:18 118:3 123:1  
132:15 187:3,4,16  
192:8 197:17 198:2  
225:14 236:10  
**balances** 16:11,15 18:5  
**Baltimore** 116:18  
**Baltimore/Washington**  
76:13  
**bank's** 15:3,10,13,19  
17:11 38:16 47:5  
**banked** 208:19 211:9  
**banker** 129:22 208:3  
**banker's** 35:6,7  
**bankers** 22:10 23:11  
27:14 30:5 31:8 53:10  
54:21 57:12,16,17  
69:9 74:18 79:6 95:19

113:4 121:18 130:7  
 130:10 131:11 139:4  
 142:4 156:19 161:13  
 162:3 166:4 168:1  
 194:14 205:11 222:12  
 229:11 236:13,16  
 237:17,21  
**bankers'** 167:9  
**banking** 1:3 2:8 3:3,4  
 3:17 4:7 5:2 6:6,7  
 9:10,21 11:19 13:8  
 29:9 36:8,11 38:6  
 41:19 49:9 50:18 75:9  
 78:17,20 104:9  
 117:16 127:11 128:6  
 130:1 132:9 137:21  
 140:1 141:14 143:2,6  
 145:21 146:2,9,18  
 152:3,6 154:5 156:11  
 160:6 197:18 198:1,4  
 198:7 210:22 213:21  
 214:6,7 220:2,10  
 221:21 226:22 241:8  
**banks'** 167:7 221:10  
 222:1,5,22 226:17  
 227:3,4,8  
**barriers** 6:1  
**bars** 32:10 83:21 84:2  
 115:13  
**base** 72:22 100:22  
 108:4  
**based** 90:4 125:10  
 174:14 176:22 183:17  
 201:2 222:9 226:1  
**basement** 152:10  
**bases** 218:8  
**basically** 32:5 35:11  
 88:2 191:10 208:3  
**basis** 13:16 81:12 82:11  
 85:1 108:13 184:1,3,6  
 184:7 196:17 201:11  
 201:13 216:3,4,15  
**batch** 155:6  
**Bean** 197:4,8,10 199:6  
**bear** 205:5  
**becoming** 134:6 225:10  
**beg** 151:6  
**began** 232:4 236:6  
**beginning** 11:12 52:10  
 163:9 170:14 212:18  
 232:7  
**begun** 76:1  
**behalf** 181:22 242:14  
**behavior** 236:13  
**belief** 222:15  
**believe** 12:9 20:6 31:8  
 55:13 57:4 63:11  
 80:21 152:22 192:6

**Belt** 233:8  
**beneficial** 78:8  
**benefit** 78:9  
**benefited** 101:9,16  
**benefits** 211:12 212:1,9  
 226:6  
**benefitted** 110:3  
**Berkeley** 75:8  
**Beshear** 242:9  
**best** 128:20 130:20  
 131:5 143:20 152:3  
 172:1 204:19 211:20  
 242:17  
**Beta** 56:9  
**Betsy** 1:21 6:16 51:7,15  
**better** 38:19 44:3 89:18  
 123:9  
**Betty** 2:7 3:8 46:14  
 127:10,22 129:21  
 135:21 136:5,12  
**beverage** 115:12  
**beyond** 86:16 214:10  
 226:7  
**bidding** 92:22  
**big** 31:9 36:3 55:12  
 60:18 61:10 70:12  
 112:2 140:20 146:16  
 146:17 147:4 151:22  
 159:12 201:4 232:12  
**bigger** 206:8  
**biggest** 81:3 139:2  
 149:12 160:8 189:9  
 208:20  
**bill** 161:18  
**billion** 66:22 90:11  
 133:8,20 134:2  
 214:11 218:1,1 228:6  
 229:22 230:1  
**bit** 19:21 43:6 63:2  
 69:21 72:8 73:12 78:7  
 87:7 108:14 117:7  
 119:11 126:21 138:11  
 138:16 139:19 146:10  
 151:3,6 183:8 202:3  
 204:13 205:11  
**bits** 124:1  
**black** 87:19 131:6  
**Blackhills** 62:16  
**blue** 90:7 218:20  
 233:16,17  
**board** 1:10 27:5 44:6  
 65:8 84:7 98:1 131:3  
 155:18 172:10 242:9  
**Bobby** 197:4,7 198:17  
**Bock** 2:2 6:13 79:13,14  
**bod** 207:6  
**boil** 107:2  
**bolstered** 16:10

**bombarded** 146:5  
**book** 23:15  
**bookings** 62:15  
**books** 56:21  
**boom** 228:21,22 229:6  
 229:8,12,17,19 231:1  
 232:3,5,13,14,19  
 233:3 234:2,6 235:2,6  
 235:18,19 236:4,14  
 236:15 237:8,14  
 238:15,21 239:10  
**boost** 110:4  
**boosted** 108:5  
**border** 47:4 51:21  
 71:16  
**borders** 21:14 55:2  
**borrower** 206:20  
 222:10  
**borrowers** 17:12 49:22  
 68:22 69:9 204:11  
 239:15,19,20  
**borrowings** 210:7  
**Boston** 92:19 116:21  
 117:5 203:9  
**bottom** 226:11 233:17  
 234:14  
**bought** 43:7 66:5  
**bounced** 84:2  
**box** 148:10,20 215:6  
 219:17  
**Bozeman** 43:19  
**branch** 44:16 72:12  
 120:6  
**branches** 13:5 47:8  
 48:17 71:21,22 90:8  
 90:10 91:3 183:18  
 209:2  
**branded** 52:14  
**branding** 12:12  
**bread** 93:16  
**break** 125:18,20 126:2  
 126:4,12  
**breaks** 23:5  
**bridge** 116:3  
**bridges** 47:18  
**brief** 129:17 171:22  
 240:21 242:3  
**briefing** 133:4  
**briefly** 127:14 128:3  
 132:13  
**bright** 28:22  
**bring** 21:11 31:13 151:7  
 210:1 240:1  
**bringing** 214:17  
**broad** 173:13  
**broadband** 98:19  
**broker** 164:21 171:14  
 171:17 173:14,21,22

174:8,10,12,14 175:2  
 175:5,6,10,16,18,18  
 176:7 177:19 178:5,9  
 178:19 179:4 183:14  
 186:11 187:1,1,12,14  
 199:15  
**broker's** 182:14  
**broker/dealer** 177:12  
**broker/dealer's** 180:8  
**brokered** 178:3,11  
 181:10 182:15,19,20  
**brokers** 55:16  
**brought** 52:1 57:22  
 63:9 64:17  
**Bruce** 2:1 6:20 71:12  
 199:12,13  
**BSA** 64:7  
**budget** 18:18  
**budgeted** 25:6  
**budgeting** 25:1  
**buffers** 166:19  
**build** 139:22 140:20  
 143:6  
**building** 151:8 155:13  
**builds** 214:15  
**bullish** 95:11  
**bumped** 84:9  
**bunch** 141:20 144:8  
 154:7  
**burden** 165:21 198:6  
**burdens** 228:14  
**bus** 115:21  
**business** 15:18 19:9  
 21:18 23:20 28:11  
 44:19 45:6 47:4,19,21  
 53:5 62:14 65:21  
 66:10 81:4 86:18 88:6  
 95:5 129:5 135:18  
 161:15 175:8,10,19  
 175:20 179:8,12  
 211:5 219:5 220:7  
 221:19,21 222:1,4,5  
 222:12 226:14 228:13  
**businesses** 11:9,11  
 12:16 15:20 16:1  
 23:21 33:5 34:11 37:9  
 37:15 38:6,9,18 39:14  
 39:14,22 40:9 69:5  
 75:16 76:3,14 77:5,10  
 80:22 81:4 83:11,22  
 85:3,8,15 86:13 92:12  
 95:7 96:20,21 98:22  
 140:10,11 166:20  
 198:11 222:14,17,20  
**busy** 26:5 40:20 98:20  
 99:4 168:2  
**butter** 93:17  
**buy** 35:12 43:3 82:17

**buy-back** 170:19  
**buying** 22:3 87:3  
**bye** 242:21,21 243:2,2

## C

**C** 155:18  
**calculate** 184:20,22  
**calculation** 34:4 183:19  
 202:18  
**calculations** 202:20  
**call** 5:16 17:6 30:12  
 88:6 125:7 147:5  
 150:15 172:12 173:6  
 178:16 193:1 222:2,8  
 222:9 223:4 233:4  
**called** 13:13 34:7 90:18  
 100:17 155:8  
**calling** 205:3 211:9  
**calls** 23:20  
**camera** 10:12 121:4  
 125:14 136:11 137:4  
 197:2 213:16  
**Camille** 204:7  
**campaign** 211:10  
**campers** 26:6  
**campus** 49:6  
**Canadian** 21:13  
**cancelled** 97:18  
**candid** 104:18  
**cannabis** 78:20  
**cap** 20:10 101:13 102:2  
 183:20,22 184:5,22  
 186:11 187:13 201:8  
 201:10,19  
**capability** 140:13,21  
**capacity** 30:15 76:10  
 76:11 96:21 155:13  
**capillary** 29:20  
**capita** 13:20  
**capital** 4:16 17:4,15  
 44:7 50:19 59:13 68:4  
 68:16 77:17,21 101:8  
 111:14 117:20 127:19  
 133:5 134:14,21  
 135:2 166:19 202:15  
 202:20 207:11 236:1  
**capitalism** 143:11  
**capitalized** 171:18  
 173:18,20 174:2  
 182:5 183:10 184:12  
 186:1,9,17,19,22  
 187:5,11,18 201:8,16  
 202:3,6,13,14,14  
**caps** 185:22  
**capture** 161:16  
**card** 181:2 212:7  
**care** 61:18  
**career** 50:18 78:17

**careful** 152:9,12  
**carefully** 70:2  
**CARES** 169:9  
**Carnegie** 155:9  
**carrier** 239:6  
**carry-out** 76:6,11  
**carry-over** 61:18  
**carryover** 53:21  
**Carver** 131:3  
**case** 75:21 82:21 83:16  
 136:2 149:2,17  
 181:22 206:15  
**cases** 19:7 40:18 48:2  
 67:17 130:14 146:21  
 146:22 147:3 159:9  
 195:15  
**cash** 16:11,14,15 18:4  
 26:3 34:22 43:1 63:2  
 90:17 101:18 234:20  
 236:5  
**categorized** 173:4  
**category** 115:12  
**Cathy** 242:11,15  
**cattle** 230:5 234:21  
**cause** 176:6  
**caused** 50:10  
**causes** 100:5  
**causing** 117:13  
**cautious** 59:21 89:16  
 130:7 237:18  
**cautiously** 46:5 68:21  
 239:14  
**CBAC** 128:6,11 129:10  
**CBLR** 197:12,20 198:5  
**CDFI** 134:7,7  
**CDFIs** 133:10,19,21  
 134:3,13  
**CDI** 134:19  
**CDs** 183:21  
**ceased** 218:2  
**celebrating** 46:22  
**center** 52:4 72:21 109:6  
 113:12  
**centers** 75:17 79:22  
 80:4,4  
**central** 13:6,6 31:20  
 47:6 58:22 241:8  
**Centreville** 6:15  
**century** 143:8,9,14  
**CEO** 6:13,15,17,18,20  
 6:22 7:1,2,4 13:2 17:6  
 18:13 28:10 31:19  
 46:12 51:7,17 58:21  
 65:19 71:13 74:10  
 79:14 90:1 95:21  
**CEOs** 74:1  
**certain** 37:11 148:22  
 166:8 190:2 191:11

192:19  
**certainly** 4:11 37:12  
 41:9 78:9 81:9 90:13  
 91:6,16 92:7 95:11  
 108:17 109:3 146:13  
 148:11,16 149:22  
 150:20 188:2 203:5  
 204:6 208:14,22  
**certifications** 181:6  
**cetera** 23:12,22 24:16  
 31:7 82:5 92:10,14  
**CFIs** 132:3,7  
**chain** 85:13  
**chains** 231:6  
**Chair** 28:4 29:7 30:19  
 31:15  
**chairman** 1:11,13,15  
 4:3 6:15 7:14 10:18  
 27:2 28:9 46:14 57:20  
 58:18 64:6 65:16  
 73:18 74:13 79:9  
 95:18 104:22 131:10  
 139:3 150:4 156:9  
 213:7 241:22 242:2,9  
 242:11,22  
**challenge** 41:16 63:3,4  
 63:19 70:13 78:12  
 101:4 109:22 120:17  
 160:5 197:20 227:19  
**challenged** 69:17 83:10  
 83:11 84:1,4  
**challenges** 15:21 17:21  
 28:18,19 64:1 74:17  
 80:14 81:3 82:7,19  
 83:13 84:10 85:9 86:1  
 90:22 98:8 106:6  
 110:2 111:21 122:5  
 122:10 227:4,22  
 229:13 239:15  
**challenging** 31:11  
 90:13 236:4  
**chance** 74:2  
**change** 52:14 138:12  
 172:18 175:17 182:16  
 183:16 185:12 190:14  
 190:20,21 193:16  
 194:5 214:20 218:6,7  
 224:20  
**changed** 26:20 34:3  
 57:10 62:4 173:16  
 174:6 183:11,17,21  
 195:13  
**changes** 6:1 52:5 59:22  
 60:1 61:17 84:5,13  
 119:22 168:9 171:14  
 171:21 173:3 182:13  
 182:17 189:21 192:11  
 199:18 201:2 204:15

218:8 224:21 225:2  
 229:10  
**changing** 5:9 45:22  
 46:1 69:15,21 77:14  
 89:8 124:13 138:11  
 170:11 189:3 190:1  
 209:20  
**chaotic** 23:19  
**chapter** 40:7 215:2,6,9  
 215:13 216:18 218:5  
 219:16,21 223:14,20  
 224:19,20 225:3,16  
 226:9,11,16 227:9  
**chapters** 215:1  
**characteristics** 135:11  
 214:12 227:5  
**charge** 12:7 205:7  
 216:13 238:11,16,18  
**chart** 216:9 217:13  
 220:12 222:3 224:1  
 225:12 227:22 229:14  
 229:16 231:18 233:11  
 233:14 238:10  
**charter** 35:20 36:4  
 145:21 146:9,9  
**chartered** 13:4 66:4  
**charters** 36:8,9 52:3,12  
 55:13,14 71:3,6  
**charts** 238:12  
**Chase** 94:11  
**chat** 125:7,15 136:9  
 137:14 138:21  
**check** 27:18 124:1  
 163:6  
**checking** 125:15  
 207:16  
**checks** 212:7  
**Chicago** 51:20 54:15  
**chief** 2:8 5:10 10:9  
 136:18  
**China** 142:21  
**choir** 144:22  
**choppy** 124:10  
**Chris** 2:12 3:15 164:10  
 164:13 188:14  
**Christmas** 32:4,6  
**Cindy** 2:1 6:18 74:10  
**circle** 148:16  
**cities** 76:15 82:11 92:19  
 116:18 117:15  
**city** 6:21 92:19 115:17  
 115:20 116:7,14,21  
 117:3 242:11  
**civic** 49:16  
**civil** 193:6  
**Clackamas** 242:12  
**clarifications** 167:12  
**clarified** 166:7 186:4,13

**clarify** 188:4  
**clarifying** 166:16  
**class** 98:2  
**classes** 120:14 132:18  
**classified** 17:15 175:16  
 224:5  
**clean** 32:16 141:15  
**clear** 79:6 226:5  
**clearly** 8:17  
**client** 218:8  
**clientele** 76:14  
**climate** 95:4  
**close** 47:21 48:9 74:21  
 76:16 94:21 108:13  
 110:6 113:13 176:12  
 240:19 242:8  
**closed** 21:13 23:2  
 44:11,16,18 217:9,14  
**closely** 13:15 20:4  
 122:17  
**closer** 116:4  
**closing** 3:21 213:7  
 217:16 241:22  
**closings** 120:6  
**closure** 72:13  
**Club** 148:3  
**CNI** 222:13,16  
**co-members** 36:21  
**Coast** 4:5 18:12 46:10  
 112:1  
**coastline** 92:20  
**coffers** 20:22  
**coincidentally** 25:14  
**collaborate** 41:13  
**collaboration** 30:1,3,16  
 106:1 128:20 131:5  
 131:13 153:17  
**collar** 90:7  
**collateral** 86:8 110:11  
**colleagues** 28:16 31:2  
**college** 88:14  
**Colorado** 7:5 22:11  
 161:8  
**Columbia** 113:9  
**combination** 232:8  
 233:7  
**combined** 24:5 191:13  
 201:14 231:9  
**combining** 70:15  
**come** 8:10 12:21 30:20  
 49:14 51:10 58:4 84:6  
 86:15,16 88:12  
 109:12 125:20 126:4  
 126:6 138:13 139:17  
 140:7 142:18 147:16  
 148:16,21 163:13  
 189:12 190:12 240:15  
**comeback** 44:1

**comes** 68:3 148:21  
 196:6 202:2 230:22  
**comfort** 76:9 125:18  
**coming** 21:15 26:7  
 29:12 63:14,15 83:5  
 84:22 86:19 108:3  
 134:14 148:2 204:19  
**comment** 57:6 64:5,16  
 135:7 142:19 148:1  
 154:1 156:1,15 158:2  
 158:11,15 200:15  
 201:4  
**comments** 7:17 72:19  
 109:19 113:3 125:13  
 136:8 156:16 197:5  
 201:2 210:21 242:1  
**Commerce** 33:15 35:15  
**commercial** 8:20 11:6  
 20:5,7 28:14,15 33:3  
 33:4 43:9 53:5 59:16  
 60:22 62:6 91:11  
 93:16 107:16 109:20  
 109:21 110:22 111:5  
 114:13 122:6 205:15  
 219:13 235:12  
**commissioners** 169:4  
**commit** 85:20  
**commitment** 39:22  
 223:21  
**committed** 99:9 165:20  
**committee** 1:3 3:4 4:6,7  
 6:11 9:8,16 10:8,11  
 22:6 36:22 46:17,18  
 51:6 57:20 65:16 71:9  
 73:20 104:17 113:15  
 127:9,9 128:3,7,9  
 137:11 156:16 241:2  
 241:10 242:7,16  
**committees** 208:2  
**commodities** 54:3  
 230:4 234:18,22  
**commodity** 62:4 101:15  
 102:3,5 230:9,15  
 231:7,10  
**common** 15:1 105:3  
 237:20  
**communicate** 189:7  
**communicated** 154:20  
**communicating** 195:17  
**communication** 64:9  
 64:13 168:21 188:20  
 190:5  
**communications**  
 155:16  
**communities** 4:21 8:12  
 9:2,11 17:3 23:11  
 30:10 36:14 47:8 53:6  
 54:13 59:9 69:11

71:22 72:3,13 99:1  
 104:20 105:2,14,16  
 120:3 128:22 132:4  
 133:22 158:6 165:13  
 208:17 209:3 221:17  
 241:19  
**commuter** 115:16  
 116:1,12  
**commuters** 116:6  
**companies** 36:3 52:2  
 70:5 94:3 95:8 146:5  
 151:9 162:6 203:19  
**company** 12:11 145:20  
 242:10  
**comparable** 201:12  
**compare** 20:17 214:11  
**compared** 24:7 54:17  
 59:17 167:4 220:13  
 236:14  
**compete** 35:10 201:17  
 201:20  
**competing** 50:15,16  
 208:21 209:12 210:15  
**competition** 62:22 86:2  
 91:21 93:17 94:15  
 100:7,8 140:19  
 142:22,22 228:11  
**competitive** 13:17  
 50:14 86:5 93:21 94:5  
 94:7 100:11 209:19  
 210:11 227:5  
**competitiveness** 6:6  
 139:8 142:19  
**competitor** 209:21  
**competitors** 24:5  
**complaints** 120:10  
**complete** 170:18,21  
 213:2  
**completed** 12:11 78:1  
 90:15 103:9  
**completely** 37:19 39:7  
 167:22  
**completing** 90:20  
**Complex** 131:9  
**complexes** 83:1  
**complexities** 18:1  
**complexity** 135:18  
**compliance** 78:1 104:4  
 117:22 119:22 120:21  
 164:14 165:2 172:13  
 172:16 188:19 189:1  
 189:4 190:16 191:3  
 193:1,21 194:21  
 197:19 225:5 226:4  
**compliment** 121:12  
**compliments** 105:22  
**comply** 172:19  
**complying** 120:3

**component** 119:18  
 123:16 158:12 159:13  
**components** 50:5  
**composite** 119:18  
 123:4,6 204:16  
**compounded** 21:11  
**compressed** 15:16  
**compression** 19:1  
 42:21 50:9  
**compressions** 62:21  
**comprised** 47:9 129:1  
**concentrated** 235:9  
**concentration** 94:19  
 101:7 121:22 237:7  
**concentrations** 114:13  
 114:15 183:1 236:21  
**concept** 131:18 151:22  
 157:10  
**conceptual** 132:19  
**concern** 26:10 71:1  
 79:1 95:2,6 97:1  
 100:3 109:4 156:2  
 202:2 208:13  
**concerned** 17:7 21:20  
 33:4 38:1,3 44:14,18  
 45:11 69:15 70:18  
**concerning** 94:18  
 197:11  
**concerns** 41:10 69:13  
 72:21 94:6 106:5  
 183:1,1 208:20  
**concise** 194:2  
**conclude** 64:5 239:11  
**concluded** 243:4  
**concludes** 135:20  
**conclusion** 18:6 27:12  
 215:16,18  
**condition** 117:19  
 135:14 228:18 235:5  
**conditions** 3:3 5:2 9:10  
 51:5 86:6 92:3 107:6  
 107:19 117:16 130:1  
 130:4 176:15 198:1  
 198:12,14 199:9  
 228:13 229:11 233:21  
 238:3,12  
**conduct** 47:3 170:3  
 206:3  
**conducted** 49:6 123:5  
 134:5 237:21  
**conducting** 105:20  
 169:20 171:2  
**Confederated** 44:12  
**confidence** 12:19 108:7  
**confident** 12:20  
**Congress** 133:7,20  
 150:11  
**Congressional** 78:22



- Connect** 56:5  
**Connecticut** 90:9,11,17  
95:12  
**connection** 124:14  
**consensus** 107:22  
108:10  
**consequence** 26:10  
**consider** 132:19 135:13  
156:18 198:15  
**consideration** 132:14  
**considered** 26:18  
181:10 199:2 218:11  
228:4  
**considers** 221:13  
**consistent** 53:10 79:7  
136:14 198:9 226:1  
**consolidating** 216:21  
**consolidation** 216:19  
216:22 217:3,10  
**constant** 53:11  
**construction** 43:8,18  
43:21 82:22 85:20  
87:1 92:14 122:16  
130:15  
**consulting** 176:17  
**consumer** 2:12 16:11  
44:10 59:16 108:7  
120:3,10 140:3  
164:12 165:1 168:12  
188:18,22 189:4  
190:16,19 191:2  
194:21 210:7  
**consumers** 18:3 70:10  
71:2 166:4,12,14  
210:2 211:4,11,20  
212:2  
**contact** 58:4 240:8  
**contain** 240:8  
**contemplated** 186:6  
**CONTENTS** 3:1  
**continual** 44:9  
**continually** 154:22  
**continuation** 48:5  
**continue** 4:15 5:1,14  
11:9,18 12:4,17,19  
13:17 17:21 18:22  
21:20 32:13 40:20  
41:2,13,18 42:6 43:13  
46:6 47:15 48:3,18  
49:8,9,10,15,21 54:11  
55:16 60:14 63:7,17  
69:4 77:6,19 82:22  
84:3 92:6 95:1 98:4,6  
99:9,14,22 100:16,17  
100:22 102:17 103:4  
104:3 111:5 112:12  
115:5 116:19 117:9  
117:14 119:20 120:1  
120:13 147:14 163:10  
180:12 199:8 204:20  
215:20 222:19  
**continued** 15:2 16:11  
17:2,7 47:22 52:8  
68:18 69:2 79:11  
81:22 92:11 99:4  
104:8 105:22 107:12  
130:13 168:12 216:19  
236:1  
**continues** 15:4 37:8  
50:12 86:21 88:17  
93:13 94:16 99:11  
100:2 102:11 103:7  
119:10 141:5 205:18  
**continuing** 40:21 73:3  
96:20 99:15,21  
111:18 143:19 160:3  
163:20 198:13  
**continuity** 170:15  
**contractors** 23:22  
**contracts** 84:16  
**contractual** 176:11  
**contrast** 232:5 233:12  
237:5  
**contributed** 15:9,15  
241:11  
**control** 201:1  
**controllable** 89:8  
**convened** 1:10 104:22  
**convenience** 137:14  
**convening** 28:5  
**convention** 122:11  
**conversation** 10:19  
78:7 163:10 226:18  
**conversations** 27:10  
203:10 205:12 212:16  
212:18 240:14  
**conversion** 91:6 103:15  
103:17,20 169:18  
**cooperation** 69:8 106:1  
126:16 168:18  
**coordination** 168:18  
**core** 4:16 52:4 91:6  
103:13 135:12 152:20  
161:15  
**corn** 230:4,17 231:7  
233:8 234:19  
**corner** 209:21  
**cornfield** 138:1  
**Corona** 19:3 101:12  
**coronavirus** 166:2  
167:11 169:13  
**corporate** 132:2  
**corporates** 30:20  
**corporation** 1:1,14,15  
75:3 209:11  
**correct** 36:6 199:5  
134:22 144:15 210:6  
**created** 90:22 178:18  
179:14,18 183:12  
201:9  
**creates** 30:15  
**credit** 17:19 29:8 50:21  
94:14 118:7 119:13  
133:10 183:19 198:11  
200:10 201:3 216:12  
216:13 238:3,12  
239:8  
**credits** 101:7 186:17  
187:7  
**crew** 64:8 65:5,5  
**crises** 206:5  
**crisis** 14:12 24:2 38:20  
40:12 207:9 224:22  
225:15 231:20,22  
237:3 238:14  
**criteria** 193:12  
**criticism** 165:19 226:10  
**crop** 32:18,21 53:7  
101:19 102:10  
**crops** 45:14  
**Crude** 20:19  
**cruise** 21:12,14  
**CSBS** 227:17  
**curios** 162:11  
**curious** 64:1 158:13  
199:15 200:12 203:21  
210:14  
**current** 13:7 75:5 81:17  
102:3,5,6 107:22  
130:1  
**currently** 48:21 71:18  
78:15 80:14 84:18  
133:14,16 143:3  
182:19  
**cusps** 237:2  
**customer** 39:9 48:15  
79:7 174:17 179:9  
**customer's** 176:13  
**customers** 13:10,13  
21:18,22 24:9 26:2,2  
34:21 38:16,22 41:3  
43:12,13 47:10 49:10  
50:2,22 53:16,22,22  
54:6 69:11,19 77:13  
81:4 86:19 87:4 91:20  
98:5,7 99:10 102:13  
120:2 153:20 165:13  
165:18 168:3 175:20  
180:6 211:1  
**customers'** 41:15  
**customized** 156:5  
**cuts** 153:1  
**cutting** 124:2,3,5 125:2  
**Cyber** 155:9 160:3

**cyberattack** 152:22  
**cyberattacks** 152:21  
**cybersecurity** 18:2  
 41:10 70:19 141:1  
 144:14 154:10 155:20  
 156:10 158:20  
**cycles** 185:10 224:10

## D

**D.C.** 75:1 116:21 117:6  
**daily** 13:16 32:1 142:12  
**dairy** 6:13 79:14 230:5  
**Dakota** 31:19,21 34:7,7  
 35:1,7,8 58:21,22  
 59:5 60:4 62:14 64:8  
 158:1,4 159:21  
**Dakota's** 59:14  
**Dakotans** 33:9  
**Dallas** 2:6 10:2 111:10  
 121:13,20 122:9  
**dampened** 130:13  
**dark** 218:20 219:8,18  
 233:16  
**data** 31:3,4 103:10  
 111:3 115:16 116:12  
 116:17 222:2,18  
**date** 16:6 172:13,16  
 173:2 183:22  
**dates** 160:12 235:19  
**day** 12:18 41:1 57:9  
 74:18 81:18 103:16  
 137:8 146:6 150:12  
 161:15 162:6 204:7  
 240:16  
**days** 12:21 37:22  
 149:20 165:10  
**DC** 11:4  
**deal** 23:7 236:9  
**dealing** 72:11 136:16  
 184:9 191:2  
**death** 13:20 19:14  
 153:1  
**deaths** 24:18  
**debates** 27:10  
**debt** 141:13 166:9  
 178:8 205:4 223:10  
 236:6 239:6,16  
**debt's** 61:18  
**debuted** 182:10  
**decades** 138:10,10  
 237:19 238:13  
**December** 91:6 172:10  
 213:22  
**decide** 195:3  
**decided** 189:22  
**decision** 38:7  
**declaration** 165:10  
**decline** 15:9 48:3 61:7

119:10 224:14,17  
**declined** 119:11 217:6  
 222:2 230:20 232:7  
**declines** 119:15  
**declining** 11:17 44:9  
 45:2 96:18  
**decrease** 50:20  
**decreasing** 15:16 100:1  
**dedicated** 4:13 166:1  
 172:7  
**deemed** 202:6  
**deeply** 30:17  
**deepness** 30:9  
**default** 11:10  
**defaulting** 43:15  
**Deferral** 119:9  
**deferrals** 17:14 123:17  
**deferred** 94:20  
**define** 214:10  
**defined** 176:21 202:16  
 235:7  
**defines** 176:8  
**definitely** 32:17 45:21  
 88:5 107:19  
**definition** 154:17  
 173:13 175:6 177:19  
 178:4,8,19 179:4  
 202:2 206:15  
**definitions** 225:17  
**defy** 14:11  
**delayed** 166:15  
**deliberation** 157:10  
**delinquencies** 17:16  
 20:8 53:19,19 77:19  
 84:18 102:12 238:16  
 238:18  
**delinquency** 119:2,5  
 239:2  
**deliver** 69:18 70:9  
**delivered** 166:21  
**delivery** 209:1  
**demand** 11:19 12:5  
 15:3 50:13 53:13  
 100:4 110:4 115:9  
 130:13 231:5 232:9  
**demands** 218:9  
**demographic** 114:9  
 218:5,10  
**demographics** 218:7  
**demonstrate** 134:12  
 180:11  
**demonstrated** 122:20  
**demonstrates** 31:5  
**densely** 90:7  
**Department** 33:15  
 35:15 104:9  
**dependent** 23:1  
**deposit** 1:1,13,15 12:3

25:3 72:22 80:8 91:13  
 100:21,22 118:12  
 135:6 161:16 164:22  
 171:15 173:14 174:8  
 174:9,9,12,14,16,20  
 175:1,3,5,6,7,10,16  
 175:17,18 176:16,18  
 176:22 177:1,2,11,16  
 177:18 178:4,9,19  
 179:4 180:22 186:14  
 187:1,1,14 197:13,15  
 199:15 200:2 202:21  
 219:15 228:10 236:10  
**deposited** 212:5  
**depositor** 2:12 164:11  
 177:2,12 181:21  
 186:18 187:8,21  
**depositor's** 177:5,6  
 180:17  
**depositors'** 177:7  
**depository** 3:7 127:5  
 128:18 179:10 180:7  
 180:19 210:5  
**deposits** 17:2 18:18  
 22:2 60:19 63:14  
 66:18 92:16 118:3  
 123:2 171:17 173:4  
 173:21 174:1,3 175:1  
 175:9,14,21 176:6,9  
 176:10 177:5,15,19  
 178:1,2,5,9,10 181:12  
 181:19 182:18 183:14  
 183:21 185:4 186:3,5  
 186:6,10,11,12  
 187:12 200:5 209:15  
**Deputy** 1:15 164:7,9,13  
**describe** 152:3  
**describes** 224:20  
**describing** 227:21  
**description** 193:22  
**descriptions** 227:3  
**design** 132:14,19  
**designate** 71:5  
**designated** 179:13,17  
 179:21 180:3,14  
 181:9,14,20  
**designations** 182:2  
**designed** 132:1  
**desk** 64:22 74:6  
**desperately** 22:19  
**despite** 16:21 50:20  
 109:1,14 115:7  
 126:12  
**details** 30:12  
**deterioration** 25:21  
 109:6 204:5  
**determination** 185:6  
**determinations** 184:19

**determine** 176:18  
**determining** 174:12  
**detrimental** 152:18  
**Detroit** 28:11,13,17  
 31:14 129:12  
**devastating** 8:4  
**develop** 5:20 131:18  
**developed** 66:13  
**developing** 135:4  
**development** 2:8 35:14  
 127:11 131:21  
**devoted** 242:16  
**dialogs** 149:11  
**Dick** 242:9,15  
**differ** 227:11  
**difference** 14:10 31:10  
 69:10 152:15 232:12  
**differences** 217:2  
**different** 37:19 57:7,9  
 69:18 80:22 85:9  
 87:20 107:9 108:14  
 141:20 144:9 146:14  
 148:14 156:22 175:14  
 194:8 201:20 225:17  
 226:20 227:1 236:13  
**differentiate** 91:20  
**differently** 188:20  
**difficult** 24:22 45:6  
**difficulties** 28:2 126:12  
**difficulty** 73:2 85:18  
**digital** 52:6 54:8  
**diligence** 5:19 70:16  
 141:12  
**diligently** 77:12  
**diner** 138:6  
**dining** 76:10  
**direct** 35:11 50:9  
 134:17 212:5  
**directed** 211:10 212:2  
**directly** 34:19 128:11  
 150:9  
**director** 1:14 7:16,19  
 9:5,18 10:1,3 28:4  
 31:15 46:14 58:19  
 65:17,19 68:10 73:17  
 74:14 79:10 95:18  
 111:10 127:10 131:2  
 164:5,7,9,14 213:11  
 240:17,20 241:20  
**directors** 155:18 169:3  
**dirty** 149:14  
**discernible** 204:18  
**discovered** 149:9  
**discuss** 175:12 188:16  
**discussed** 29:5 129:22  
 130:7 131:5 144:10  
**discusses** 215:7  
 219:21

**discussing** 213:18  
**discussion** 3:3 7:9 8:1  
 10:8 65:18 150:5  
 154:12 155:22 199:16  
 208:21  
**discussions** 74:1  
 129:18  
**disparities** 31:5,12  
**disparity** 200:11  
**disproportionately**  
 133:12,22  
**disruptions** 231:5  
**distancing** 19:12 48:19  
**distinctive** 135:11  
**distributed** 116:10  
 220:15  
**distribution** 75:17  
**District** 113:9  
**districts** 97:22  
**divergence** 117:11,14  
**diverse** 139:22  
**diversified** 72:8  
**diversity** 59:16 129:2  
**division** 2:5,9,10,11,12  
 2:13 9:19 142:11  
 164:4,11 213:12,19  
**document** 196:10  
**documentation** 50:1  
**documents** 172:18  
**doing** 4:12 32:16 35:18  
 44:3 45:20 68:1 72:17  
 73:1 105:15 110:7  
 115:13 121:21 122:2  
 126:13 146:14 147:10  
 148:18 149:4 189:5  
 190:15 195:9 196:1  
 206:18  
**dollar** 73:15  
**dollars** 25:14 49:13  
 88:3 134:17  
**domestically** 143:8  
**donate** 93:6  
**door** 85:17 139:11  
 209:4  
**doors** 148:21  
**Doreen** 2:9 3:12 164:5  
 164:15 169:19 196:21  
 197:7 199:11 203:4  
 206:1 207:14,15  
 208:8 209:7  
**Doreen's** 210:21  
**dosage** 97:8  
**dose** 14:4 48:8 76:2  
**dotted** 238:8  
**double** 163:6 233:3  
**doubled** 88:2 232:17  
**DOW** 204:9  
**downgrades** 119:15,18

**downside** 8:18  
**downturn** 114:7 229:7  
 235:6  
**downward** 234:8  
**dramatic** 231:18  
**dramatically** 236:17  
**draw** 41:4 61:5,9 76:22  
**drew** 138:4  
**drive** 20:19 54:7 98:5  
**drive-up** 60:6  
**driven** 82:1 127:17  
 131:16 132:9,16  
 134:15,22  
**driver** 18:20  
**driving** 43:4 73:6 82:14  
 94:2  
**drop** 110:15,22 230:22  
**dropped** 17:9 32:2 37:6  
 112:12 231:21  
**dropping** 112:5  
**drops** 110:20  
**drought** 45:11  
**drove** 238:15  
**dry** 58:6  
**due** 5:18 15:16,21  
 18:19 21:2,6 26:21  
 52:4,8 55:18 67:7  
 70:15 72:14 100:8  
 101:11 118:7 123:1  
 130:11 141:11 158:11  
 236:2 238:4  
**dues** 12:8  
**dwindled** 66:7  
**dying** 66:8  
**dynamic** 11:3 45:22  
**dynamics** 82:4 116:20  
 198:2

---

**E**


---

**e-retail** 115:12  
**Eagle** 7:3 42:1,1 129:12  
**earlier** 60:16 70:21  
 82:15 85:22 112:22  
 126:21 127:8 132:5  
 158:2 167:19 193:15  
 204:7 226:19 237:16  
 237:19  
**early** 23:2 38:7,13  
 81:21 110:15 133:17  
 147:8 233:20 239:22  
**earning** 51:3  
**earnings** 18:18,21 50:6  
 50:6,20 68:5,6 91:9  
 118:1,9,10 119:21  
 120:16 207:11 215:21  
 236:1  
**easier** 5:7 139:14  
 166:13  
**east** 18:12 79:17  
**eastern** 45:9 90:9,11,17  
 95:12 240:3  
**Eberley** 2:9 3:12 164:5  
 164:17 197:3,9 204:2  
 209:17  
**echo** 72:19 106:14  
**echoing** 23:17  
**ECIP** 134:18  
**economic** 5:1,2 11:1  
 16:12 49:20 92:3  
 107:5,19 108:13  
 113:16 115:19 118:7  
 120:19 130:8 143:10  
 198:12 212:1 227:5  
 233:8,13,18  
**economical** 225:11  
**economies** 92:5 226:2  
 226:5  
**economists** 142:9  
 200:19  
**economy** 4:20 8:5 9:21  
 11:14 12:18 20:14,20  
 21:8 32:22 33:7,20  
 47:20 61:11,16 67:13  
 73:1 95:10 103:6  
 106:21 107:13,18  
 111:4 143:2  
**ecosystem** 139:5  
 140:20 142:15  
**edge** 80:1  
**edged** 238:19  
**education** 31:4 49:5  
 80:3 155:16 158:12  
 160:3  
**educational** 79:22  
**effect** 174:5  
**effective** 172:11 173:2  
 190:5 194:8 195:20  
**effects** 20:15 214:20  
 215:8 225:1  
**efficiency** 91:10 192:3  
**efficient** 104:6 144:5  
 189:8 192:14  
**effort** 35:5 175:15 188:2  
 208:18 242:16  
**efforts** 15:20 23:8 30:13  
 30:19 46:19 48:6  
 49:17 74:19 78:3  
 79:11 114:19 165:17  
 168:17  
**eight** 90:10 233:2,4  
**eighth** 13:20  
**either** 76:6 100:17  
 125:13 157:2 179:21  
 197:1 218:18  
**elected** 44:17  
**electronic** 170:8

**electronically** 7:8  
**elevated** 109:17  
**eligibility** 193:12  
**eligible** 13:22 19:5 34:5  
 97:13 131:20 175:11  
 193:4,9  
**eliminated** 52:6  
**Elmqvist** 2:6 3:5 10:1  
 111:9 112:9 121:7,11  
 124:2,8,13,17,22  
**email** 144:19 145:2  
 157:13 163:1  
**embargoed** 75:2  
**embarked** 92:1  
**embrace** 153:10 158:7  
**emergency** 127:18  
 133:5 167:22  
**Emory** 131:8  
**emphasis** 131:12  
**employed** 88:7  
**employee** 17:22 48:15  
**employees** 13:14 21:22  
 24:13 52:7 60:9,9  
 71:21 75:22 96:22  
 103:18 151:2 168:3  
 170:9  
**employment** 75:14 83:7  
 108:15,16  
**enable** 134:21 166:10  
**enabling** 179:22 180:13  
 181:3,19  
**encourage** 137:12  
 147:12 150:20 165:8  
 172:2 188:7 195:1  
 196:4  
**encouraged** 165:12  
 166:18  
**encouraging** 62:17  
 97:16  
**ended** 32:6 119:3,6  
 229:2 230:12 234:6  
 235:2 239:10  
**Endowment** 155:9  
**energy** 57:22 122:4  
 148:19  
**enforcement** 183:5  
 202:17  
**engage** 76:9 106:10  
 145:3 163:20  
**engaged** 175:20  
**engages** 176:20  
**engaging** 147:7 177:20  
**engineering** 141:8  
**enhance** 144:13  
**enhancements** 170:6  
**enjoyed** 74:1  
**ensure** 4:19 77:13 79:6  
 143:19 198:5

**ensuring** 17:18 19:12  
 30:21 77:4  
**entered** 12:13 117:18  
 120:19  
**enterprise** 170:6  
**enthusiasm** 57:22  
 151:20  
**entire** 46:2  
**entirely** 150:4  
**entities** 35:14 140:19  
 147:5 175:14 180:9  
 180:17 181:4  
**entitled** 243:4  
**entity** 174:20 175:3,4,7  
 175:13 179:3,19,20  
 180:3 181:14  
**entry** 47:13  
**entry-level** 171:1  
**environment** 5:7,9 15:1  
 21:21 42:22 47:16  
 50:11 227:6  
**environments** 13:9  
**equality** 30:21  
**equals** 56:22  
**equipment** 54:2  
**equipped** 170:5  
**equitable** 140:1  
**equities** 61:17 151:10  
**equity** 166:14 226:1  
**escalate** 50:1  
**especially** 36:12 53:19  
 57:10 62:16 114:15  
 136:3 159:8 199:20  
 211:21 225:15 229:12  
 231:7  
**essential** 54:21  
**essentially** 43:2 206:13  
**EST** 1:10  
**establish** 5:18  
**established** 22:14 25:1  
 59:6 128:4 166:1  
**estate** 8:20 20:5,8 33:1  
 45:4 73:6 81:19 82:14  
 93:16 99:17 101:17  
 107:16 109:20,21  
 110:22 111:6 114:14  
 117:8 122:6 205:15  
**estimate** 134:13 135:1  
**estimator** 134:21  
**et** 23:12,22 24:15 31:7  
 82:5 92:10,14  
**Europe** 152:10  
**evade** 175:15  
**evaluated** 154:22  
**evaluating** 135:13  
**evaluation** 190:22  
**evenings** 39:8  
**event** 121:16 162:14

**events** 17:10 41:11  
 114:22  
**ever-** 77:13  
**ever-increasing** 18:1  
**everybody** 7:10,21  
 10:20,20 36:21 40:11  
 48:13 50:13 57:4,16  
 58:10 83:20 87:8  
 125:17 152:8 156:22  
 163:3,8 240:21  
**everybody's** 141:20  
**everyone's** 126:15  
**evident** 69:1  
**eviding** 5:9  
**exacerbated** 6:4  
**exact** 25:17 142:8 200:3  
**exactly** 95:5  
**exam** 56:4,7,14 65:2  
 95:3 103:16 104:6  
 188:18 189:21 192:3  
 192:5,11 194:5,7,21  
 195:18 196:8 202:4  
**examination** 56:3  
 135:10 165:2 168:1  
 169:21 170:18,19  
 185:9 217:3  
**examinations** 56:9 78:2  
 105:20 123:15 164:8  
 164:14 168:17 208:4  
**examine** 228:21 229:10  
**examiner** 56:15 165:19  
 170:18  
**examiners** 103:21  
 104:1 135:4,10  
 142:10 148:21 171:6  
 171:7 182:21 191:8  
 194:12 205:11 206:3  
 206:4,9,22 239:5  
**examines** 218:5 225:16  
 227:9  
**examining** 206:5  
**example** 177:22 180:8  
 181:1,18  
**examples** 105:15  
**exams** 114:21 165:22  
 170:3,22 171:3  
 189:11 190:15,16  
 191:21 203:15,22  
**exceed** 13:9 75:12  
**exceeded** 143:7  
**exceeding** 187:16  
**exceeds** 187:4  
**Excel** 142:5  
**excellent** 27:8,11 56:6  
**exception** 11:3 47:22  
 101:20 175:11 178:1  
 178:16,19 179:1,3,7  
 180:3,10,14,16

181:20  
**exceptionally** 8:12 78:6  
 242:4  
**exceptions** 178:18  
 179:14,17,21 181:3,9  
 181:15  
**excess** 80:7 100:8  
 187:13  
**exchange** 105:19 170:6  
**excited** 12:20 26:22  
 62:5 63:20,21 64:3,4  
 147:17 149:19  
**exciting** 78:18  
**excluded** 175:5  
**excluding** 12:4  
**exclusive** 174:20 175:7  
**Excuse** 178:7  
**executive** 10:9  
**executives** 129:2 132:6  
 132:7  
**exemption** 181:5  
**exist** 84:20 155:5  
**existence** 47:1 241:3  
**existing** 52:13 100:8,16  
 165:18 172:17 186:16  
 186:18 205:14  
**exists** 85:11 141:13  
**exit** 27:4  
**exiting** 225:20  
**expand** 76:14 96:21  
**expanded** 236:18  
**expect** 69:19 137:2  
 205:2,5  
**expectation** 13:10  
**expectations** 18:3 51:3  
 51:3 108:4 227:6  
**expected** 25:21 118:6  
**expend** 139:9  
**expense** 102:22 159:9  
 159:10,10  
**expenses** 102:18 230:6  
 230:10,20  
**expensive** 225:6 230:8  
**experience** 11:18  
 105:12 151:8 219:3  
**experienced** 21:6 77:15  
 80:10 84:12 232:22  
**experiencing** 53:18  
 114:10  
**expert** 136:20 142:16  
**experts** 142:14  
**expired** 63:11 199:3,4  
**exploding** 14:11  
**explores** 130:20  
**export** 231:10  
**express** 127:6 202:1  
**expressed** 28:17 78:17  
**extend** 104:8 154:17

**extended** 222:13  
 228:17  
**extending** 64:2  
**extends** 47:5  
**extent** 182:22  
**External** 1:16  
**extrapolation** 185:14  
**extremely** 39:12 54:5  
 57:15  
**eye** 119:20

---

**F**


---

**F** 67:3 73:14  
**FACA** 128:7  
**face** 74:18 142:20,21,22  
 158:14 228:11  
**faced** 15:21 28:18 79:7  
 111:22 161:10  
**facilitated** 170:7 174:9  
**facilitating** 174:16,22  
 175:21 176:9,10  
**facilities** 60:6 75:17  
 84:11,14 94:1  
**facing** 74:4 110:1 130:2  
 130:5 160:6  
**fact** 26:20 45:21 93:5  
 109:1 111:12 124:11  
 162:13 222:17  
**factor** 77:1  
**factors** 114:6 135:13  
 218:10 227:4  
**factory** 152:17  
**facts** 205:5  
**fail** 157:2  
**failure** 217:15  
**failures** 227:14  
**Fair** 97:18  
**Fairbanks** 18:14  
**fairing** 80:13  
**fairly** 32:11 62:19 73:6  
 80:13 91:1 110:16  
 214:4 240:15  
**Falcon** 46:12 129:14  
**fall** 32:9 82:1 100:19  
 173:4 232:6  
**fallen** 118:4  
**fallout** 17:20  
**Falls** 64:8 65:5  
**families** 4:12 168:4  
**family** 14:12,18 43:21  
 59:6  
**fan** 146:16,17 147:4  
 151:22  
**fantastic** 56:17 65:5  
 137:10 157:12,15  
 161:5 162:18  
**FAQs** 169:13 172:18,21  
**far** 8:10 14:15 26:1 51:2

- 62:6,18 76:21 125:11  
138:10 146:15 149:22  
155:1 184:10 199:21  
229:20 239:17  
**Fargo** 29:11  
**farm** 61:16 66:9 101:17  
101:18 223:10 228:19  
228:21 229:6,11,15  
229:21 230:10 232:3  
232:7,11 233:12  
234:2,6 235:1,5,5,7  
235:11,13,17,18,22  
236:3,13,14,16,20  
237:2,6,14,17,21  
238:3,5,15 239:6,8,9  
**farmers** 34:3,5 53:7,14  
61:3 67:4,5,7 69:5  
88:7 101:12 102:4  
224:9 230:16 236:6  
237:15 240:1  
**farmers'** 231:17  
**farming** 230:22 233:14  
**farmland** 224:17 230:8  
231:13,16,19,21  
232:2,5,6,9,10,13,16  
232:19,20 233:3  
236:17,22 237:9,12  
237:15  
**farms** 236:18  
**fast** 47:1 69:15,21  
87:13  
**faster** 118:20 216:21  
219:3 228:10  
**favorable** 67:15 100:13  
116:20 117:5 120:20  
**FDI** 173:12 183:6  
**FDIC** 3:17 4:6,7,15 9:13  
12:14,15 23:9 27:2,4  
27:13 30:14 36:21  
38:12 46:15 56:7,13  
58:2 64:2 74:3,19  
79:10 89:19 95:19  
104:9 106:9 109:16  
127:19 128:4,12,16  
129:8,16 131:17  
133:18 134:5,11  
135:3 137:3,22  
138:13 139:18 142:7  
146:2,8,12,19 148:18  
151:1,20 156:18  
162:9 163:16 165:4  
170:9 173:21 176:1  
184:15 197:11,22  
199:17 203:5 211:4  
213:22 219:19 221:13  
222:11 228:15 235:7  
237:22 239:5 241:4,9  
241:18 242:14  
**FDIC's** 10:1,2 36:8 56:5  
78:3,12 127:10,17  
135:5 136:18 213:14  
213:19 214:7  
**FDIC-insured** 131:20  
133:9  
**FDIC.gov** 165:7  
**FdiTech** 3:9 5:11,14  
**feared** 8:5  
**features** 159:6 171:21  
**February** 20:17,18  
37:21 108:21 109:1,2  
112:3  
**Fed** 184:6 208:12,21  
209:12  
**federal** 1:1,13,14 11:14  
23:9 71:6 128:6  
210:15 211:22 241:6  
**fee** 25:14 99:16,18  
**feedback** 105:19  
128:16 134:10 169:2  
189:18 191:7,15,17  
194:12,13 195:8,17  
195:22 196:5,12,18  
242:5  
**feel** 26:17 32:12 37:17  
39:12,16 86:14 95:11  
147:10 157:4 194:6  
**feeling** 79:5  
**fees** 176:14 180:21  
182:14 211:16  
**feet** 51:1 69:7  
**fell** 187:17 234:13 235:2  
**fellow** 22:9 46:18 95:19  
**felt** 53:15 201:14 215:4  
**fertilizer** 101:21 230:7  
**fewer** 184:11 217:8  
**field** 171:6  
**fierce** 93:17  
**fighting** 11:1 51:12  
142:1,2,2,5 158:3,10  
**figure** 25:4  
**file** 170:6 181:16  
**files** 170:8  
**filing** 182:9  
**filings** 173:5  
**fill** 104:3 109:3  
**Fin** 155:8 160:2  
**final** 221:12 238:2  
**finalize** 85:4  
**finally** 135:3 142:17  
**finance** 15:8 236:7  
**financial** 6:3 8:18 15:21  
30:22 72:1 85:4 100:9  
111:13 120:20 122:22  
131:17,21 132:11  
134:7,18 135:12,14  
136:21 155:12 159:13  
165:12,20 203:18,20  
215:9 216:7 224:22  
240:2  
**financially** 54:14 77:15  
**financing** 223:8 237:16  
**Finastra** 70:20  
**find** 24:9 41:18 73:3,4  
106:16 126:22 137:14  
149:4 166:5 169:13  
**finding** 18:3 81:5 83:4  
144:14 147:8 202:19  
**findings** 189:1,10  
190:12 194:7 195:19  
**fine** 58:11 123:22  
124:19 136:11  
**fingernails** 149:14  
**Finnegan** 2:12 3:15  
164:11 188:15  
**fintech** 70:4 145:20  
146:5  
**fintechs** 57:8 70:11,22  
136:16 141:12 147:1  
148:7  
**firms** 131:17 132:12  
**first** 4:5 5:10 6:12 14:2  
16:19 19:16 22:16  
25:22 28:10 31:14,19  
34:2 40:15,16 41:4  
49:20 50:3 52:21  
56:15 57:10 60:21  
73:9 77:22 87:9,15,16  
88:1 89:2 107:5,18  
108:8 113:13 115:18  
129:11 138:19 139:21  
140:7 145:20 146:11  
148:2 150:2 151:16  
151:19 155:14 161:15  
167:14,21 183:16  
184:10 186:2 189:2  
193:17 207:19 214:5  
214:7 216:8 217:5  
224:11 225:9 228:20  
239:1,3 240:17  
242:10  
**firsthand** 105:1  
**fiscal** 11:20 108:5  
**Fiserv** 52:4 70:5  
**fish** 26:7  
**fit** 159:4 181:14,19  
**fits** 161:3 178:4 179:4  
**five** 32:3 48:20 56:8  
71:21 75:6 94:9  
141:19 218:2 224:19  
**fix** 178:8  
**fixed** 50:17  
**flash** 22:16  
**flat** 80:12 86:3 101:20  
110:16 222:6 232:10  
**flexibilities** 170:10  
**flexibility** 4:20 17:8  
165:14 166:10 168:1  
168:8 201:10  
**flexible** 184:14 201:18  
**flip** 123:13  
**Florida** 6:22 36:20 37:2  
38:1 151:19  
**flow** 34:22  
**flows** 16:14 218:12  
**flushed** 236:5  
**flying** 21:17 23:3  
**focus** 4:15 77:20  
190:18 210:2 223:13  
229:3 233:11  
**focused** 6:3 13:12 77:4  
111:21 154:15  
**focuses** 5:5 213:14  
216:18  
**focusing** 114:19 176:1  
**folks** 23:3 26:7 44:4  
66:5 82:8 88:7 89:3  
92:18 95:1 171:4  
207:20  
**followed** 10:10 229:8  
**following** 23:9 228:22  
238:13  
**food** 49:16 101:13  
115:12 231:5  
**foothold** 29:19  
**footprint** 47:5  
**forbearance** 44:4 119:9  
**force** 75:12  
**forecast** 107:22 108:10  
116:22  
**forecasting** 11:20  
**forecasts** 113:20  
**foregoing** 126:7  
**foreign** 143:18  
**foremost** 6:7 207:19  
**forget** 51:12  
**forgive** 213:4  
**forgiven** 44:8  
**forgiveness** 16:6 19:20  
50:1 87:17 130:14  
**format** 191:1,12 192:12  
193:16 194:9  
**formation** 131:16  
**formed** 217:6  
**Forreston** 6:17 51:19  
52:13  
**forth** 60:10,19 62:3,11  
**fortunate** 12:6 32:5  
83:21 136:17 155:7  
56:12  
**Fortune** 95:7  
**forum** 73:19

**forward** 5:4 7:9,22 8:13  
8:16 9:1 10:19 27:1  
27:15 30:3 41:9 60:1  
63:5 65:8 71:8 74:7  
81:3 85:5 86:11 89:21  
93:13 95:15 127:2  
137:2 147:6,15  
163:20 182:20 188:20  
190:1,3 192:13  
193:13 195:5 196:3  
196:14,17 199:9  
209:13 214:17 241:15  
242:17  
**found** 98:8 219:2 236:3  
**foundation** 93:5  
**founded** 13:4 71:17  
**four** 23:6,16 24:4 52:22  
55:8 59:8 94:9 141:19  
144:9 219:21  
**four-year** 88:14  
**fourth** 25:22 107:21  
224:11  
**framework** 131:18  
198:6  
**frameworks** 207:10  
**Francisco** 73:22  
**Frank** 2:7 3:6 10:2  
106:10,12,22 111:7  
112:15 121:3,6  
**frankly** 6:4 24:1,8 25:6  
**fraternity** 162:16  
**free** 143:10  
**Freeport** 51:19  
**freeze** 112:2  
**frequency** 168:22  
**frequently** 166:4  
167:10  
**friction** 142:12  
**Friday** 27:5  
**friendly** 95:5  
**friends** 162:2  
**front** 38:11 113:15  
116:17  
**fronts** 85:10  
**frustrated** 39:20  
**FSA** 101:11  
**fulfill** 128:17  
**fulfillment** 30:8  
**full** 76:10 84:22 108:1  
148:16 172:12,15  
205:2,5 210:10  
216:13  
**fuller** 11:12  
**fully** 14:6 19:6 48:12,17  
97:12 170:3  
**function** 44:11 225:10  
226:4  
**functions** 150:15

**fund** 30:14 127:17  
131:16,19 132:1,14  
132:15,18,21,21  
133:1,2 134:7 164:22  
179:10 236:18  
**fundamentally** 144:5  
154:11  
**funded** 25:16 56:2  
152:17 153:15  
**funding** 99:8,10,11  
101:1,2 130:14 135:1  
182:22 223:9  
**funds** 123:11 132:1  
134:19,20 176:13  
180:18 184:6 186:17  
187:7,16,20 212:5  
**further** 15:15 50:9  
203:12  
**future** 12:20 17:5,18  
22:20 41:19 89:21  
95:15 102:9 105:9  
139:16 140:1 142:18  
143:7,17 149:6

---

## G

**G** 3:15  
**gaining** 53:4  
**gains** 109:2,7 114:3  
117:9 232:15  
**gap** 216:2  
**gatherings** 97:6  
**GDP** 107:21  
**general** 113:16 116:14  
117:17 120:18 130:10  
146:2  
**generally** 87:1 88:10  
92:22 114:2,9 116:19  
176:19 238:20  
**generate** 132:1 234:19  
**generated** 99:18  
**generating** 216:1  
**generation** 59:6  
**generational** 53:14  
**generic** 145:18  
**generous** 86:6  
**gentleman** 63:9  
**geographic** 129:5  
221:8  
**Georgia** 131:4  
**getaway** 76:16  
**getting** 32:12 82:16  
89:1,3 124:4 159:4  
192:4 194:7,12  
195:16  
**Getzlaff** 1:19 31:18,18  
**ghost** 54:16  
**Gilbert** 1:20 3:8 46:11  
51:15 127:6,10,22

129:13,19 136:5,12  
156:15  
**gist** 124:4  
**give** 29:7 106:10 126:1  
168:1 169:17 188:17  
203:14 209:18 213:3  
241:22  
**given** 110:10 111:3,3  
**gives** 44:21  
**glad** 26:14 41:7 57:20  
**global** 142:21 155:12  
**globally** 142:19 143:9  
**globe** 230:14  
**goal** 198:10  
**goals** 128:14,17 168:14  
214:9 226:13  
**gold** 219:8,18  
**gotten** 137:18  
**government** 21:13  
32:17 45:14 61:12  
62:3 66:1 130:11  
152:17 166:22 210:16  
**governmental** 231:9  
**governments** 132:21  
**Governor** 54:22  
**GPD** 108:10  
**grad** 78:16  
**grade** 49:3  
**grain** 61:15 102:6  
**grandfather** 59:7 138:7  
**grandstand** 97:21  
**Granite** 13:21  
**grant** 51:11 134:19  
**grants** 33:16 34:15  
62:10  
**grasshoppers** 45:13  
**grateful** 24:12 26:14  
27:1 29:16,22 47:17  
**greater** 11:2 101:8  
228:11  
**greatest** 156:11  
**greatly** 115:11 147:13  
**greetings** 31:13  
**grew** 137:22 219:13  
221:1 222:4 232:2  
**group** 22:13 28:5 32:10  
59:3 66:5 89:20  
130:19 131:6 156:19  
156:20 224:13 241:16  
**group's** 211:3  
**groups** 70:16 147:7  
153:15 207:3  
**grow** 25:5,5 53:15  
63:17,17,17 66:14  
101:1 231:22  
**growing** 37:14 43:20  
53:16 70:19 75:11  
79:1 81:18 230:14

**grown** 16:18 152:16  
**growth** 11:20 12:3,3  
16:21 17:5 18:16,17  
18:17 25:2,3 54:12  
66:13 68:15 72:22  
80:8 91:11,13 107:21  
108:1 118:2,12,15,16  
123:2 132:3 148:13  
197:14,15,17 219:4  
228:10 236:4  
**Gruenberg** 1:14 7:16  
7:19 9:6 28:4 31:15  
46:14 58:19 65:17  
68:10 73:18 74:14  
79:10 95:18 240:18  
240:20 241:21  
**guaranteed** 66:1  
**guarantees** 222:21  
**guarded** 85:6 86:10  
88:11 105:7  
**guardedly** 21:19  
**guess** 85:6 111:10  
124:17 148:17 204:18  
**guidance** 69:3 79:6  
166:3 168:22 169:7  
169:14 203:7,12  
205:15 206:1  
**Gulf** 112:1  
**guns** 92:13

---

## H

**hack** 152:11 153:6  
156:5  
**hacked** 157:13  
**hacks** 140:17,17  
**Hal** 90:1 203:2  
**half** 12:1 49:12 51:20  
72:14 73:15 223:11  
227:20 228:20 229:9  
232:22 239:12  
**half-way** 51:17  
**Hampshire** 13:3,19  
14:2,3,9  
**hand** 125:13 138:22  
163:6 197:2 203:2  
**hand-in-hand** 40:9  
**handle** 111:12  
**handled** 203:15  
**handling** 54:2  
**hands** 125:16 136:9  
151:12 163:7 212:15  
**happened** 4:10 26:1  
42:11 189:15  
**happening** 85:8 93:9,14  
203:12  
**happens** 57:18  
**happy** 48:10 104:7  
136:5 138:20 139:19

145:10 168:7 188:11  
204:2  
**hard** 21:9 29:3 61:22  
80:20 82:17 103:19  
171:11,21 208:15  
209:14 211:4  
**harder** 139:15  
**harm** 190:19  
**harms** 45:14  
**Harold** 2:2 6:14  
**Hartford** 116:18  
**hate** 124:18  
**hats** 141:21 158:7  
**have-nots** 227:11  
**haves** 227:10  
**Hawk's** 131:8  
**Hayes** 1:21 58:9,15,17  
58:20 151:17 157:19  
157:21,22 161:4  
198:17,20 199:1,10  
**head** 95:2  
**heading** 84:7  
**headquartered** 46:21  
71:14 96:4 219:3,12  
221:5,8 235:15  
**Health** 165:11  
**healthy** 10:21 21:21  
50:19 207:11  
**hear** 5:12 9:12 10:14  
27:20 53:10 55:15  
58:10,11 65:11 105:1  
105:17 112:9,19  
113:1,3,5 121:7 124:8  
124:22 139:18 143:5  
145:5 149:18,19  
150:7,9,22 151:12  
157:19 160:2 197:8  
198:21  
**heard** 33:5,11 63:6  
64:16 105:4,21,21,22  
106:3 107:4,16  
108:15 125:10 127:8  
129:10 130:3 131:1  
131:15 144:19 156:2  
**hearing** 9:1 74:16  
106:16,17 123:21,22  
124:11,19,20 138:18  
150:21 158:8 163:16  
205:10  
**heart** 36:6 42:6  
**heavily** 23:1 200:8  
**heavy** 200:21 230:13  
**held** 55:18 56:4 97:19  
167:3 200:5 220:1  
221:6,7,20 222:15  
223:12  
**Hello** 36:18 65:10 71:12  
126:11 199:14

**help** 33:14,18 34:16,21  
35:1,13 41:1,8 61:20  
63:21 68:22 69:10  
70:11,15 71:7 73:4  
79:6 81:1,5 88:8  
99:22 118:9,9 134:5  
140:12 141:15 171:2  
171:5 176:17 192:6  
211:4,11,13  
**helped** 11:15 32:17  
41:6 42:20 44:5 57:3  
61:12,20 99:12  
101:14 231:11  
**helpful** 34:14 57:15  
62:2 65:1 67:4,8 69:3  
104:2 149:5 171:20  
189:13 212:14  
**helping** 30:20 45:16  
**helps** 43:11,12,15  
**Henry** 70:7  
**Hi** 41:22 111:9 121:7  
145:16 151:18  
**high** 11:7 14:20 15:3  
16:5 19:7 29:4 31:3  
43:8 45:4 48:22 53:12  
55:7 98:9 122:15,15  
123:2 171:7 173:16  
184:18 214:4 227:10  
228:4,7,9 239:17,20  
**higher** 17:22 31:1 49:5  
73:12 96:8 114:3,13  
130:15 184:1,5  
201:11 215:20 216:8  
219:14 228:9 230:10  
237:12 238:19  
**highest** 96:15 190:18  
218:14,18,21 239:3  
**highlight** 128:21 196:13  
**highlighted** 5:13  
236:12  
**highlights** 169:10  
171:14  
**highly** 217:19  
**highs** 11:8 14:14  
**hike** 26:7  
**hindsight** 24:11  
**hire** 96:22  
**hired** 5:10 131:17 171:1  
171:6  
**hiring** 133:1 160:6  
**Hispanic** 47:9 129:3  
**historic** 14:8 112:1  
238:16  
**historically** 15:2 17:4  
72:4 119:7 191:1  
**history** 51:22 224:2  
**hit** 14:13,16 21:2,9 38:2  
66:16 121:16 203:6

207:14 208:11  
**hits** 145:2  
**hoarding** 26:3  
**hog** 234:21  
**hogs** 230:5,18  
**hold** 220:10  
**holding** 19:11 20:9,9,10  
52:2 220:17,17  
**hole** 87:20 109:3  
**holidays** 23:12  
**holistically** 5:22  
**home** 11:10 12:18 14:9  
22:3 24:20 31:6 33:6  
78:12 99:13,14  
116:13 117:9,11  
161:21 166:14  
**homes** 21:1 43:1,3  
**hometown** 13:8  
**honor** 36:20  
**honored** 22:12 27:7  
**hope** 4:11 10:20 36:2  
55:4,20 56:16 58:1,5  
62:7 65:1 67:21 69:2  
78:8 88:18 112:18  
147:13 242:19  
**hopeful** 26:5 46:5 71:4  
**hopefully** 21:16 27:16  
32:13 59:4 60:13,14  
89:17 192:13 195:6  
201:22  
**hopefulness** 8:16  
**hoping** 62:12 111:4  
**horrible** 24:2,11  
**Horvat** 2:2 6:14 89:22  
90:1 203:2,3  
**hospitality** 33:17 44:2  
83:21 92:7 94:17,19  
**hospitalization** 19:14  
48:3  
**hospitalizations** 24:13  
24:17  
**hospitalized** 67:18  
**host** 78:5 134:11  
**hosted** 133:18  
**hotel** 62:13 84:20  
102:20  
**hotels** 23:21 37:11 44:3  
83:22 84:3 92:10  
115:4 220:21  
**hour** 51:21 142:16  
**hours** 29:14 48:18  
51:20 85:19 170:18  
**house** 43:5 166:2  
**household** 198:11  
**households** 166:20  
**houses** 43:7  
**housing** 14:8 37:8,14  
42:18 73:3,4 82:21

92:16 105:10 122:3  
130:15  
**housing-** 33:2  
**how's** 158:18  
**huge** 33:18 34:22 35:1  
69:9  
**Hughes** 2:7 3:6 10:2  
112:18,21  
**hurricane** 121:15  
**hurricanes** 206:6  
**hurts** 100:15  
**hybrid** 49:6

---

**I**


---

**ICBA** 161:20,22 162:9  
**Idaho** 6:21 71:14,14,19  
73:5  
**idea** 38:17 56:13 150:22  
157:9,12 206:11  
226:12  
**ideals** 138:10  
**ideas** 13:15 145:3  
**identify** 128:21  
**IDI** 174:18 185:2 186:19  
186:21  
**IDIs** 184:21  
**ignored** 159:14  
**ignoring** 147:9  
**Il** 131:2  
**Illini** 51:12  
**Illinois** 6:17 51:10,18  
53:1 54:18 55:6,9,11  
55:14,19,21 56:2  
138:1  
**Image** 56:8  
**imagine** 55:22 93:18  
**immediate** 8:3  
**immediately** 238:21  
**impact** 8:4 38:5 67:12  
68:13 105:4 120:12  
120:13 134:13 135:1  
182:14 212:1  
**impacts** 77:17  
**implement** 155:2 169:8  
196:16  
**implementation** 127:18  
188:7  
**implementing** 159:1  
**implications** 107:14  
**importance** 48:16  
**important** 7:8 26:17  
47:15 93:8 110:10  
122:7 136:4 142:13  
171:16 173:15 181:13  
194:13 218:6 221:16  
223:19 227:7 230:4  
234:21  
**importantly** 144:18

- impossible** 45:5  
**impressed** 208:4  
**impression** 162:12  
**impressive** 111:20  
**improve** 12:19 111:5  
 189:7 206:17,19  
**improved** 19:21 37:4  
 47:20 91:10 107:11  
 107:19 120:16 238:12  
**improvement** 62:7  
 109:14 113:16  
**improvements** 111:4  
 123:11  
**improving** 107:5  
 108:16  
**in-person** 32:9 49:4  
**inactive** 172:22  
**inbox** 145:2  
**incentivized** 230:13  
**inception** 59:19  
**include** 127:16 128:15  
 134:16 177:4,7,9,17  
**included** 67:3 130:11  
 132:12 155:13 169:12  
**includes** 47:6 113:8,9  
 135:16 179:13 183:18  
 214:18 215:6 219:16  
**including** 65:18 111:14  
 112:2 122:3 129:3  
 132:15 133:1 164:20  
 169:15 174:21 176:16  
 183:1 198:2 220:20  
 226:21 230:4  
**inclusion** 6:3 30:22  
 139:21  
**inclusive** 139:10,22  
**inclusivity** 140:9  
**income** 25:14 47:11  
 57:2,2 61:7 99:16,18  
 133:11,22 203:19  
 216:1 228:21 229:6  
 229:15,17,20,21  
 232:3,11 233:12  
 234:2,6,11,16 235:1,5  
 235:18 236:14 237:14  
 238:15 239:9  
**incomes** 230:11 231:11  
 232:7 233:14,22  
 234:3,7,9,13 237:2  
**increase** 21:16 55:17  
 60:19 101:15 102:17  
 116:3 118:5,6,20  
 120:10 123:10 197:14  
 212:12 215:15 225:22  
 236:20 239:5  
**increased** 15:7,14  
 16:16 20:13 21:3  
 26:20 42:18 77:16  
 100:7 101:11 118:3  
 119:3,6 140:19  
 168:21 170:7,11  
 204:11 217:10 221:14  
 223:1 230:7 235:1  
**increases** 77:2 230:3  
 232:20 236:21 238:22  
**increasing** 16:10 18:4  
 117:19 225:14 236:18  
**incredible** 25:4  
**incredibly** 149:3  
**Independence** 28:10  
 31:14 129:11  
**Independent** 161:13  
 162:2  
**indexed** 233:15  
**indicate** 20:16  
**indicated** 209:3  
**indicates** 116:13  
**indicative** 176:5  
**indicators** 68:8  
**individual** 9:10 209:16  
**individuals** 38:6,18  
 40:1  
**indoor** 97:5  
**industrial** 79:21 94:1  
 110:3 220:20  
**industries** 37:11 80:22  
 83:17 92:6,9 220:20  
**industry** 5:3 21:19  
 33:17 41:13,14,19  
 44:2 57:13 94:18  
 120:13 149:9 152:18  
 167:5,5 220:4,5 221:2  
 225:21  
**industry's** 220:2,10  
 221:21  
**infected** 88:22  
**inflation** 229:15  
**inflexible** 44:21  
**inflows** 218:22 219:9  
**influx** 21:4 42:13 66:18  
 92:18  
**information** 9:15 41:15  
 70:17 106:16 182:7  
 192:8,15 194:20  
 198:18 212:4,14  
 213:3 240:7,8  
**informational** 40:3  
**informative** 105:17  
 240:10  
**infrastructures** 151:11  
**initial** 113:12 120:11  
 226:1  
**initially** 138:4 231:4  
**initiated** 170:15  
**initiative** 140:6  
**initiatives** 5:14 131:2  
 133:17  
**innovate** 153:10  
**innovated** 146:21  
**innovation** 2:8 5:6,11  
 5:21 6:2,2 136:18  
 137:3 139:12 146:17  
 146:17,20 148:14  
 150:6 154:11 158:20  
**innovation@fdic.gov**  
 144:20 163:2  
**innovations** 147:16  
 149:10  
**innovative** 41:18  
**input** 132:8 200:15  
**inputs** 101:19  
**inset** 215:6 219:17  
**inside** 30:14 141:14,17  
 142:7 147:8  
**insight** 115:19 188:18  
 203:14  
**insightful** 130:22  
**insights** 106:17  
**inspections** 166:16  
**instances** 17:8 210:16  
**institution** 13:4 17:1  
 72:1 90:4 127:5 130:2  
 135:12,19 156:17  
 186:9,13 187:5,7,11  
 187:17 190:13 194:19  
 210:8,9 211:7,13  
 212:11  
**institution's** 135:14  
 165:17  
**institutions** 3:7 94:10  
 100:9 119:14 122:8  
 128:18 130:5 131:22  
 134:4,18 135:7  
 146:20 151:9 152:19  
 159:8 160:15 165:12  
 165:21 166:18 171:19  
 173:18 179:10 180:7  
 180:19 184:11 186:16  
 187:10 189:20 190:2  
 190:6 191:11 192:19  
 194:4 201:1,7,15,19  
 204:8,10 217:1,8  
 223:14 224:3 225:7  
**instruct** 206:21  
**instructions** 126:2  
 173:8 206:2,9  
**insurance** 1:1,14,15 2:5  
 2:13 9:19 94:3 146:8  
 213:12,19  
**insured** 146:19 211:6  
 211:12 212:10  
**integral** 138:8  
**integration** 12:11  
**intended** 184:13  
**intention** 30:8  
**interaction** 127:1 162:2  
 162:9,12  
**interagency** 134:12  
 135:9 173:6,7 205:16  
**interest** 10:6 15:2,10  
 29:9,22 34:10,16,18  
 35:3 38:17 42:22  
 50:10,10 74:16 78:17  
 100:1,2,11,14,19  
 130:12 159:10 164:22  
 171:17 174:2 180:21  
 181:21 182:4 183:8  
 183:12,14 187:13  
 216:8 232:8 239:18  
**interesting** 42:10 81:20  
 83:9,14 115:16  
 131:13 149:10,17  
**interestingly** 130:3  
**interference** 9:9 18:22  
 31:21,22 42:20,21  
 43:9 45:7 70:7 111:12  
 111:15,15,19,22  
 121:12,14,15,20  
 122:3,8,11,12,20,21  
 123:5,6,9,12,14,16,19  
 142:16 179:5 184:3  
**interior** 166:16  
**intermediary** 178:8  
**intermediate** 178:4  
**internal** 168:14 204:9  
**internally** 144:12  
**international** 47:14,18  
 47:19 129:14 155:10  
**internet** 98:10,11,14,15  
 152:6  
**interns** 78:15  
**interoperability** 141:1  
**interoperate** 144:1  
**interpolation** 185:13  
**interpretation** 178:22  
**interpretations** 174:6  
**interruption** 123:21  
**interview** 150:3 151:5  
**introduce** 51:6  
**introducing** 152:5  
**introduction** 165:1  
**Introductory** 3:2  
**inventories** 102:6  
 130:15  
**inventory** 14:16,22 21:1  
 93:2  
**invested** 100:6 101:5  
**investing** 132:17  
 159:15,22  
**investment** 16:13 29:12  
 29:15 100:6 127:19  
 133:5 134:17,19



**investments** 15:13 44:6  
100:15,16 131:20  
132:20 133:9 134:14  
134:16  
**investors** 132:2,16  
133:1  
**invitation** 89:20 137:7  
**invite** 196:22  
**involved** 27:11 41:15  
136:15 153:3 176:14  
181:11  
**involving** 188:21  
**lowa** 95:22 96:13,18  
97:3,3,7,17,18 98:10  
103:15 104:9  
**lowans** 97:12 98:13  
**Ireland** 6:20 71:13  
**ironically** 25:15 27:3  
**IRS** 212:5  
**Island** 6:16 90:4,8,10  
91:3 92:3,8 94:6 95:4  
95:12  
**islands** 113:10 154:7  
**isolated** 232:20  
**issue** 43:6 94:17 98:17  
101:3 202:10 206:1,2  
206:8 215:8 218:6  
225:16  
**issued** 4:19 133:13  
135:7 169:6 203:7  
**issues** 9:9 55:9 62:19  
72:11 74:4 84:12,12  
85:13 86:8 87:22 93:9  
130:1,4 188:4 198:14  
200:18 214:18 225:8  
**issuing** 169:1  
**it'd** 137:20 162:8  
**it'll** 89:17  
**item** 26:17 57:1  
**items** 9:14

**J**

**J** 1:14  
**Jack** 70:7  
**James** 131:1,5,10  
**January** 32:7 64:6  
103:8,12,14 161:16  
172:20 224:4  
**Jefferson** 6:18 74:11  
75:2,8  
**Jelena** 1:10,13 3:2,22  
**Jersey** 117:13  
**job** 39:19 62:2 64:9  
65:5 76:4 78:10 114:3  
120:1 123:19 203:5  
206:1 241:12  
**jobs** 16:2 34:2,2 81:6  
85:20 108:20,22

109:8 122:1  
**John** 1:18 2:11,13 3:14  
3:19 7:3 164:8 165:3  
169:16,18 171:10  
203:4 213:10,13,15  
240:5,7  
**Johnson** 1:21 6:16 51:7  
51:9,15  
**join** 22:12 65:15 89:20  
121:5  
**joined** 66:12 136:21  
157:4 164:6,10  
**joining** 65:17 137:18  
156:15  
**Jr** 1:20 3:8 6:21 46:11  
127:7 129:13  
**July** 27:16 95:3 242:18  
243:2  
**jump** 14:19 136:11  
**June** 173:5 191:21  
**junior** 155:19  
**jurisdictions** 11:4  
**justice** 171:22

**K**

**Kalispell** 43:19  
**Kea** 1:15 7:11,14 9:5  
10:15 27:17,21 46:15  
58:11,16 65:11  
104:14 112:4,11,20  
121:3,9 123:20 124:3  
124:10,15,19 125:1  
126:10 136:1 145:14  
151:15 157:17 161:6  
162:21 163:5,22  
196:21 197:7 198:16  
198:22 199:11 203:1  
207:15 210:18 212:13  
240:5,12 241:20  
242:22  
**keep** 33:6 53:16 89:9,13  
119:20 207:4  
**keeping** 44:14,16  
**keeps** 152:2  
**Kelly** 1:18 27:18,20  
28:1,9 40:6 129:11  
**Ken** 27:18,19  
**Kenneth** 28:9 129:11  
**KENNTH** 1:18  
**Kent** 51:19  
**kept** 232:10  
**key** 23:3 127:15 138:8  
196:10 219:17 220:6  
223:8  
**kid** 152:10  
**kinds** 72:2 90:22  
159:20 205:10  
**Kitner** 2:1 6:18 74:9,10

**knew** 38:10  
**known** 70:8  
**Kootenai** 44:12  
**Kristie** 2:6 3:5 106:9,12  
106:22 111:8 112:4,7  
112:13,16 117:17  
121:1,4,9 123:20  
124:11,21 126:3  
**Kristie's** 121:4  
**Kristy** 9:22

**L**

**labor** 75:12 82:19 83:11  
84:13 85:12 96:15  
105:11 109:6 113:21  
**lack** 21:11 94:14  
**lag** 116:22  
**lags** 45:18  
**Lake** 6:14 79:15 233:9  
**lakes** 80:2 82:8  
**land** 19:3 51:10 53:9  
101:17  
**landscape** 209:19  
**Laredo** 46:21 47:12  
129:14  
**large** 21:2 37:9 44:20  
75:16 78:6 94:13  
134:17 151:9,10  
197:13 200:11 215:22  
219:16 230:21  
**largely** 80:2 82:1  
**larger** 43:18 53:6 68:16  
91:21 111:17 117:15  
201:1 219:5 221:9  
227:22  
**largest** 47:13 148:4  
159:10 200:5 231:16  
234:19  
**late** 23:11 81:9 231:9  
240:16  
**lately** 35:4  
**latent** 17:19  
**latest** 49:11  
**launched** 211:9  
**law** 131:17 132:11  
173:16,17 174:7  
178:17 186:6,8  
200:21 201:17  
**laws** 120:4  
**lead** 5:11 23:9 241:6  
**leader** 38:8  
**leaders** 24:6 49:18  
**leadership** 31:9 40:8  
74:14 227:7  
**leading** 10:18 204:15  
230:10  
**League** 30:7  
**learned** 39:3 130:21

**learning** 41:12 71:8  
**lease** 20:11 25:17  
**leasing** 28:15  
**leave** 155:3 170:19  
**led** 19:2 111:16 121:21  
197:16 216:22  
**left** 236:19 238:4  
**legal** 103:11 142:11  
176:11  
**legalization** 79:3  
**legislature** 34:15  
**leisure** 109:5,5  
**lender** 57:7 87:11 148:4  
225:18  
**lenders** 57:12 87:4  
220:19 221:3 222:19  
225:13  
**lending** 3:18 15:4,18  
35:11 44:10 59:17  
76:18 91:12 107:15  
123:3,3 134:3 148:3  
197:14,16 213:15  
219:14,22 220:13,15  
221:1,2,18,19 222:6,6  
222:12 223:6,7,12,22  
224:9 236:18 237:4  
237:13  
**lengthy** 189:20  
**lessons** 130:21  
**let's** 27:19 125:3,20  
145:14 161:6 178:12  
183:7 184:8 187:9  
210:19 214:4 216:17  
228:15 231:13  
**letter** 191:10,13,16  
193:17 194:1  
**letting** 74:5  
**level** 15:5 19:7 29:4,22  
29:22 31:1,3 47:21  
53:12 69:14 76:9  
80:10 108:17,21  
109:1 114:3 140:4  
173:16 193:2,7,8  
214:4 229:20 231:3  
**levels** 11:12 37:7 48:4  
68:4 71:5 75:10 81:10  
93:3 102:6 108:10  
109:9,15 110:9 115:7  
115:15,21 116:2,5,15  
116:16 117:4,19  
119:1 120:15 123:10  
198:3 207:11 232:3  
236:2,2 238:20 239:6  
239:16  
**leverage** 16:22 17:8  
26:13,16 63:10  
140:13 168:17 197:6  
239:20

licking 51:13  
 lift 200:21  
 light 79:21 200:14  
 227:13  
 lighten 58:7  
 likewise 14:5 16:18  
 limit 97:5  
 limited 76:10 81:12  
 100:4 174:2  
 Lincoln 51:11  
 line 57:1 74:21 75:18  
 83:19 175:8,10  
 179:12 226:11 233:16  
 233:17  
 lined 97:21  
 lines 161:18 238:7,9  
 lining 24:2  
 link 165:7 169:12  
 liquid 118:19  
 liquidity 4:17 16:9 26:4  
 26:8,11,21 38:19  
 44:21 50:12 62:20  
 77:17 86:4 89:12,14  
 93:20 101:3 114:18  
 118:11 119:1 120:15  
 123:8,10 130:11  
 166:19 202:9  
 list 51:16 103:3 119:12  
 179:13 187:22 188:8  
 listed 169:15  
 listen 137:8  
 listening 10:19 139:3  
 listings 14:15  
 little 16:5 32:20 37:18  
 43:6 45:10 53:8,18,21  
 63:2 86:22 87:7 94:5  
 96:8 102:12 126:21  
 138:11,16 139:1,19  
 146:10 151:3,6 183:8  
 204:13 205:11  
 live 11:3 33:10 42:15  
 126:17  
 lives 142:12  
 livestock 53:8 61:15,19  
 living 33:13 84:10,21  
 152:10 159:19 211:17  
 load 20:8  
 loan 12:3 15:6 16:3,4  
 16:13 17:13,17 20:11  
 25:16 32:15 35:13  
 38:16 40:4,14 41:6  
 49:13 50:13 68:17,20  
 77:19,20 80:10 86:1,6  
 87:5 88:3 91:4,10  
 100:4 101:6 102:11  
 102:18,21 103:5  
 118:4,16 119:2,5  
 130:13 131:7 149:15

166:8 171:2 205:6  
 211:12 218:8 219:4  
 222:5,10 223:1  
 225:10 226:22 227:1  
 228:9,10 236:4,20  
 237:7  
 loan's 205:1  
 lobbies 81:11 98:5  
 lobby 44:11,16  
 lobbying 36:5  
 local 3:3 9:2,3 10:4  
 15:20 17:2,6 34:8,15  
 39:14 47:20 49:16  
 51:5 76:8 82:17 105:5  
 138:3,6 184:9,12,16  
 184:22 185:1,4,5,7,8  
 185:13,17 201:19  
 206:7 208:1,14  
 228:11  
 localities 209:15  
 locally 49:3 201:20  
 located 13:3 28:10  
 58:22 59:12 71:22  
 74:20 79:16 95:22  
 96:2 218:22 235:14  
 location 75:19  
 locations 51:19 52:12  
 52:19,22 53:6 59:8,9  
 59:18 75:6 79:19  
 81:12 94:11  
 locking 102:8  
 lodging 110:14  
 lone 147:11  
 long 31:11 33:6 99:11  
 163:9 181:11 191:14  
 196:6 206:18 214:14  
 224:2 228:21 230:12  
 235:7 240:22 242:20  
 long- 51:22 234:11  
 long-term 116:9  
 long-time 104:4  
 longer 161:11 162:19  
 176:1 184:17,18  
 185:15 229:20  
 longer-term 206:16  
 look 7:9,22 8:13 9:1  
 27:1,14 30:14 31:2  
 54:11 65:8 71:8 74:7  
 89:10,11,16,21 93:12  
 95:15 107:13 111:2  
 147:15 148:14 153:2  
 157:3 163:20 165:8  
 169:17 188:8,8  
 190:11 193:19 196:3  
 200:9,18 204:20  
 211:20 228:17 241:15  
 242:17  
 looked 40:11 64:2

189:22 200:13 204:21  
 218:13  
 looking 5:21 8:16 10:19  
 35:18,19 36:4 38:3  
 41:9 63:13 64:21  
 68:15 70:1 76:15 85:2  
 85:5 86:10 93:19  
 160:13 189:6 195:10  
 195:14,20 196:8  
 199:17,22 206:12,13  
 lose 44:17  
 loss 21:6 102:18  
 losses 17:17,19 20:11  
 25:17 68:17 77:20  
 118:7 216:13  
 lost 23:2 112:13  
 lot 4:10 6:9 8:22 29:3,8  
 32:18,19 33:5,9,14,15  
 35:4 43:11,17,20 44:5  
 44:21 53:13 55:17  
 59:20,22 62:9 72:20  
 73:8,13 80:8,11 85:7  
 85:12,17 86:13,18,22  
 88:8 89:11 92:18  
 93:19,22 130:4  
 137:18 141:17 142:1  
 144:6,11 148:13  
 150:1,12,14 171:21  
 182:7 188:4 211:22  
 241:19  
 love 70:14 137:14 145:4  
 low 15:2 17:16 19:15  
 21:2 34:10 37:8 42:22  
 45:19 47:11 48:4  
 50:16 93:2 99:12  
 100:11,14 108:4  
 119:8 130:14 133:11  
 190:2 192:19 211:16  
 216:15 227:12 228:8  
 232:8 236:2 237:9  
 239:18  
 low- 133:21  
 lower 116:6 118:22  
 185:19 189:20 194:4  
 219:13 237:2,8  
 lowest 13:20 14:16 93:2  
 96:13 218:14,18  
 219:9 233:22 234:8  
 Lowry 2:1 6:20 71:12  
 71:13 199:13,14  
 202:1  
 lows 217:7 238:17  
 lumbering 80:3  
 luxury 161:11

---

**M**

Madam 10:17 27:2 28:3  
 29:7 30:19 31:14

46:13 241:21 242:22  
 Madness 51:14  
 magnified 229:5  
 mail 212:8  
 mailbox 172:7  
 main 36:13 59:12  
 104:21 107:3 138:9  
 Maine 113:8  
 mainframe 155:4  
 maintain 11:16 185:9  
 maintained 19:13  
 168:10  
 major 22:21 24:4 97:1  
 107:14 115:5,22  
 116:20 117:11 218:10  
 234:17  
 majority 18:21 60:3,9  
 158:4 235:14 241:7  
 making 4:8 6:6 21:22  
 125:6,7 149:17  
 153:19 160:1,9 162:7  
 makings 166:3 169:7  
 Malad 6:21  
 management 2:9,10,11  
 37:21 114:20 117:21  
 117:22 120:21 123:6  
 123:11 135:15 154:15  
 164:4 193:22 206:14  
 206:18 207:10  
 manager 132:15 133:2  
 managers 181:2  
 managing 17:21 62:20  
 63:5 70:22  
 mandate 42:5  
 mandates 19:10 32:6  
 mandatory 170:2  
 manner 194:8 198:9  
 manufacturing 75:16  
 111:18 121:22  
 map 218:16,17 235:13  
 March 12:15 16:2,15  
 20:2 29:11 38:14  
 51:13 63:11 109:2,14  
 133:17 199:3  
 Margaret 1:22 7:1 65:13  
 Margaret's 161:21  
 margin 15:10,16 19:1  
 42:21 50:10 62:21  
 94:16 100:1,2,15,19  
 margins 67:5 93:21  
 130:13 216:8  
 mark 1:17 13:2 47:2  
 147:21 149:8 207:16  
 207:16 210:18,19  
 212:13  
 market 11:2,3,13 12:14  
 14:8,11 18:8 28:14,14  
 28:18 33:2,4 37:8,14

- 79:19 80:2 82:2,4,7  
84:13 86:20 92:16  
94:2,4 105:10,11  
109:6 113:21 143:11  
183:18 184:21 185:3  
200:22 201:1  
**marketing** 176:17  
**marketplace** 94:7  
**markets** 9:3 43:19 83:6  
115:5 116:20 117:12  
117:13 122:14 221:4  
228:12  
**marks** 233:19  
**Marnie** 65:11,14  
**Mars** 143:21  
**MARTIN** 1:14  
**Maryland** 11:4 12:13  
74:21 75:20 113:8  
**mask** 19:9 32:6  
**masks** 19:13 97:4  
**Massachusetts** 94:10  
**massive** 26:3 142:21  
**match** 107:3  
**matchmaking** 176:20  
176:21 177:4,9,17,21  
**material** 119:14,17  
221:11  
**materials** 85:16  
**matter** 78:20 79:4 126:7  
164:2 243:4  
**mature** 100:16  
**maturities** 185:14  
201:21  
**maturity** 183:22 185:17  
185:19 186:14 187:3  
**MBI** 29:12,15  
**MBIs** 29:19,21  
**McCurry** 1:19 6:21  
36:18,19 151:16,18  
151:19 156:14 157:15  
**McKinley** 18:13,15  
19:16  
**McWilliams** 1:10,13 3:2  
3:22 4:3 7:15 46:13  
46:14 57:21 58:18  
64:6 65:16 73:18  
74:13 79:9 95:18  
242:2  
**MDI** 127:9,15,20 128:4  
128:10,14 129:1,6,15  
129:22 130:17,18,19  
130:20 131:12 132:6  
133:17 135:20  
**MDIs** 128:19,22 129:3,8  
129:9 130:19,22  
131:6,21 132:3,7  
133:9,18 134:6,13  
**mean** 20:21 43:2 61:16  
61:22 64:12 146:8  
150:16 160:5,9,20  
182:18 202:5  
**meaningful** 152:21  
155:15 204:14 241:11  
**means** 150:17  
**meant** 38:10 68:14  
**measure** 8:9  
**measured** 216:12  
**measures** 218:19  
238:16  
**median** 14:13 118:12  
218:11,21 223:16  
237:6 238:18  
**medians** 238:9  
**medical** 79:22 80:4  
**Medicine** 131:9  
**medium** 14:17 130:9  
**meet** 36:13,20 49:9  
137:12 168:12 202:5  
206:15  
**meeting** 1:3 4:5,13,14  
6:12 7:8,12 27:4,6,15  
63:12 64:17 65:9 74:8  
104:22 112:22 120:2  
126:14,21 127:4,13  
127:16 130:17 133:7  
136:7 165:9 203:19  
241:16 242:20 243:3  
**meetings** 19:11 37:21  
89:21 169:3 237:21  
**meets** 177:18  
**mega** 24:7  
**megaphone** 149:21  
**Meghji** 2:8 3:10 5:12  
136:19 137:5 146:11  
147:19 149:7 151:14  
153:22 157:11,16,20  
158:16 161:5 162:13  
163:4,18  
**member** 1:16,17,17,18  
1:18,19,19,20,20,21  
1:21,22 2:1,1,2,2,3  
10:8 51:7 131:3 154:5  
**members** 3:4 6:11 7:18  
9:8,13,16 10:11 31:21  
42:8,9 46:19 59:2  
104:16 125:3,9,12  
129:6 136:3 150:11  
161:12 163:15,19  
170:12 196:22 243:1  
**memories** 138:5  
**mention** 40:6 63:8  
78:19 107:17 192:10  
192:18 211:2 215:5  
**mentioned** 12:9 59:21  
60:16 68:10 73:14  
82:15 85:12,22 93:2  
109:21 115:4 116:12  
118:11,21 166:6  
167:18 170:22 173:19  
188:2 193:15 194:10  
231:14 237:16  
**mentioning** 137:21  
**merge** 52:20  
**merged** 52:3,12  
**merger** 103:9,11 217:15  
**mergers** 55:17 217:1  
**merit** 157:9  
**mess** 36:15  
**messages** 151:4  
**Messerschmitt** 2:3  
95:17,20  
**met** 4:10 28:9 36:1,1  
107:20 137:12 150:10  
**metric** 218:15  
**metrics** 110:6 111:13  
117:2 120:14,20  
218:13  
**metro** 219:1 221:6,9  
**metropolitan** 47:7  
**Mexico** 47:13  
**Michigan** 129:12  
**Microsoft** 41:11 70:20  
140:17 156:5  
**mid-** 75:15  
**mid-1990s** 232:1  
**mid-February** 121:17  
**mid-summer** 110:17  
**middle** 32:7 39:10  
51:16 90:16,21 138:1  
**Midwest** 229:4 233:5,6  
233:12,16,21 234:3  
234:10,13,17 235:16  
237:12 238:5 239:3  
**migration** 73:5 117:15  
204:14 218:12  
**migratory** 21:6  
**Mike** 2:2 6:13 79:14  
170:13 171:10 172:7  
173:10 178:14 190:6  
192:16 193:13 194:9  
196:19 214:4  
**miles** 75:1 79:17 90:6  
**military** 21:3,4  
**milk** 230:19  
**mill** 90:5  
**Miller** 2:10 3:13 164:6  
171:9 200:17 202:12  
205:22  
**million** 11:22 13:7 16:1  
19:17,19 20:1 23:14  
23:15 25:3,15 29:12  
31:20 39:15 42:3 47:2  
52:11,18 53:2 56:21  
56:21 59:7,8 60:17  
61:1,4,9 65:20 66:1,8  
66:14,15,17 67:2  
71:20 73:10 75:6  
76:19 77:3 80:6,7  
87:16 90:18 91:18  
93:6 94:22 96:6 97:7  
98:19 99:4,7 108:22  
109:8 131:7 158:5,5  
159:17,18,18 217:19  
222:17,22 223:4,17  
223:18 228:4  
**millions** 134:16  
**mind** 147:22 149:3  
213:4  
**mine** 28:6  
**minimum** 26:19  
**Minneapolis** 82:7  
**Minneapolis/St** 79:18  
82:2,4 86:19  
**minority** 2:7 3:7 29:9  
127:4,11 128:18  
133:10,21 134:3  
135:6 140:10 156:17  
**minute** 6:10 172:8  
**minutes** 106:19 126:4,5  
162:21 212:22 213:5  
**mission** 13:9 22:15  
42:6 127:17 131:16  
132:9,16 134:15,22  
241:8  
**Mississippi** 111:16  
**Missoula** 43:19  
**Missouri** 59:13 159:19  
**mistake** 147:2  
**mistakes** 237:18  
**mix** 129:5  
**mixed** 79:19 92:4  
**Moab** 71:14  
**mobile** 226:22  
**model** 49:6 116:11  
**models** 129:5 226:14  
**moderate** 43:10 47:11  
54:12 133:11  
**moderated** 120:8  
239:17  
**moderating** 68:15  
**moderator** 7:12  
**modernize** 188:3  
**modifications** 17:13  
102:13 166:8  
**modify** 38:16 165:17  
**moisture** 32:19  
**moment** 121:4 136:2  
145:8,14 202:11  
**momentum** 10:22  
**money** 20:21 34:20  
63:15 193:6  
**Mongold** 1:17 18:10,12

**monitor** 5:1 103:4  
198:1,13 199:8  
**monitoring** 20:4  
**Montana** 7:3 42:1,11,14  
42:15 43:19 44:5,6  
45:2,9,17 129:13  
**Montanans** 43:5  
**month** 23:2 194:16  
214:2 228:16 242:8  
**monthly** 83:4 185:8  
**months** 23:3,16 25:2,4  
61:1 62:8 69:6 72:10  
81:5 84:6,15 85:1  
86:14 102:16 108:8  
136:22 153:7 207:22  
**mood** 58:7  
**morning** 4:4 18:10,11  
22:9 28:3 46:9 63:13  
167:14  
**morning's** 130:6  
**mortgage** 12:10,13  
15:3,6 18:19,20 42:18  
86:17,21 87:4,5 99:12  
105:11 123:3 166:11  
225:13,17  
**mortgages** 28:20  
225:14  
**motivators** 227:14  
**motive** 36:6  
**Mount** 62:16  
**Mountain** 7:1  
**Mountainview** 66:6  
**move** 30:3 84:5 124:18  
127:2 136:13 173:9  
174:7 176:12 178:12  
181:6 182:4 184:8  
187:9 190:1 199:9  
212:19 241:21  
**moved** 94:10 167:17  
172:21  
**movement** 21:3 119:13  
**moving** 42:14 46:1 60:1  
63:4 66:10 87:13  
92:19 185:11,20  
186:2,20  
**Mt** 18:13,15 19:16  
**multi-family** 43:17 83:1  
114:16 116:17 220:22  
**multifamily** 43:22  
**multiple** 16:12 75:9  
175:13  
**Musk** 143:20  
**mute** 58:14 207:18  
**muted** 237:13  
**mutual** 13:4 17:1 18:13  
90:3  
**mutually** 78:8

---

**N**


---

**NAACP** 30:7 40:7  
**name** 22:10 52:14  
58:20 65:13 71:12  
74:9 79:13 89:22  
95:20  
**named** 204:12  
**narrowed** 216:2  
**Narvaez** 1:20 3:8 46:9  
46:11 127:7,22  
129:13,21  
**nation** 13:21 23:4 68:3  
118:21 148:4  
**nation's** 235:13  
**national** 9:18,21 14:4,7  
30:5 75:13 106:20  
107:18 108:17 113:22  
116:16,22 117:4  
118:13,18 119:4,7  
127:10 131:11 167:22  
183:16,17,20,22  
184:1,5,13 185:12,16  
200:1,5,10 201:5,11  
208:2 213:11  
**nationally** 113:18  
118:16  
**nationwide** 207:1  
**Native** 43:4 129:4  
**nature** 14:3 46:2 135:17  
201:21 202:7  
**near** 11:8 15:4 130:9  
**nearby** 90:9  
**nearly** 18:15 66:2 151:7  
218:1 230:17 234:11  
**necessarily** 176:5  
208:7  
**necessary** 149:6  
**neck** 88:10  
**need** 5:22 8:19 22:1  
29:19 30:2 35:22  
36:15 41:3,13,17 55:4  
63:19 70:11,11 81:5  
85:16 96:22 105:22  
127:2 139:22 140:20  
141:7 154:8,17,19,20  
154:21 158:7,7  
184:20 192:15 202:10  
205:6,7,9,17 206:18  
226:3  
**needed** 30:17 53:15  
88:8 168:6,8 185:15  
**needs** 22:3 36:13 49:9  
64:11 98:6,15,16  
120:2 132:9,16  
155:21,21 168:3  
169:8 185:8 210:22  
230:18  
**negative** 81:8

**negatively** 44:19 118:1  
**negotiation** 176:14  
**neighborhood** 200:4  
**neighborhoods** 29:20  
133:11  
**neighbors** 53:13  
**Neil** 1:19 6:21 36:18  
151:16,18 153:22  
155:16 157:12,16  
**nervous** 64:19  
**net** 15:10 21:6 50:10  
100:1,1,19 130:12  
216:8 217:10 218:11  
218:21 219:9,9  
229:15,21 230:10  
231:17 233:14,22  
238:11  
**network** 31:7  
**never** 55:20 143:2  
224:16 241:12  
**new** 2:7 5:8 10:3 13:3  
13:19 14:2,3,9,15  
19:7 21:4 25:8 35:18  
41:2 43:20 45:5 48:2  
78:21 79:7 83:18  
86:22 87:5 88:20,22  
89:4 91:3 92:19 100:4  
100:14 102:9 103:20  
113:7,22 114:17  
115:17 116:14,20  
117:3,13,13 118:22  
120:19 134:12,14,16  
134:18 135:1 136:3  
138:14 139:12 144:15  
149:16 150:3 172:9  
172:19 173:2 178:21  
179:18 182:10 183:13  
186:17 187:2,8,15,20  
193:18,18 209:21  
217:6,8 225:22  
**newer** 226:21  
**newest** 59:2  
**newly** 171:5  
**Newport** 13:3  
**news** 82:3 110:18  
**nice** 52:22 57:1,3 59:15  
59:17 61:17 62:2  
**nicely** 84:3  
**night** 39:10 152:2  
**nightmare** 50:2  
**nights** 23:12  
**nimble** 70:9  
**nine** 17:9 86:14 90:9  
129:2,6 132:5 178:17  
**nominee** 180:5,18  
187:6,19  
**nominee's** 179:8  
**non-** 186:13 187:2  
215:19 216:10 222:3  
**non-community** 214:13  
215:22 216:7,16,20  
**non-competitive** 143:1  
**non-existent** 82:21  
**non-interest** 216:1  
**non-maturity** 184:4  
186:3,5,5,12,14,15,18  
186:22 187:8,15  
**non-owner** 20:4,7  
**non-performing** 17:15  
50:22  
**non-tribal** 42:9  
**norm** 48:1  
**normal** 32:13 48:17  
150:12  
**north** 31:19,20 33:9  
34:7,7,22 35:6,8  
71:15 80:1,19  
**northeast** 109:18  
117:10  
**northern** 51:18 53:1  
84:7 233:9  
**Northwest** 79:16  
**notable** 117:11 123:10  
219:21  
**notably** 114:7  
**note** 49:22 133:3  
182:13 205:9 221:12  
**noted** 120:18 183:2  
204:7 239:5  
**notice** 179:18,20  
180:15 181:10 182:9  
**noticed** 40:13 141:22  
189:19 235:19  
**notices** 182:12  
**notify** 185:6  
**November** 81:13  
**number** 24:8 38:4 48:2  
49:13 55:13,16 64:11  
73:12 88:2 94:21  
108:20 122:7 139:4,7  
143:13 150:13,14  
154:3 162:15 164:18  
169:7 170:7,15 208:1  
217:6  
**numbers** 29:3 56:19  
62:18 67:20 83:3  
117:5 200:3 202:6

---

**O**


---

**objective** 177:1,3  
**objectives** 135:12  
**obligations** 52:9  
**OBSERVATION** 1:5  
**observations** 9:14,20  
10:5 104:19 106:11  
106:20

**observed** 123:1  
**obtain** 181:17  
**obviously** 8:20 60:18  
 61:19 80:8 82:14  
 83:14 85:11,22 138:9  
 206:7  
**OCC** 145:20 146:7,13  
**occasional** 82:11  
**occupancy** 84:11  
 116:15  
**occupied** 20:5,7  
**occurred** 25:9  
**occurs** 55:21  
**October** 4:11 64:18  
 107:20  
**off-balance** 66:2  
**off-tenor** 185:14  
**offer** 10:4 19:3 34:9  
 35:14,16 75:9,14  
 99:10 174:3 185:2  
**offered** 34:15 100:12  
 168:5 170:19 185:19  
**offering** 143:19 185:4  
 186:10 211:15  
**offerings** 200:9  
**offers** 43:1  
**office** 11:6 13:14 38:13  
 58:1 59:12 64:8 91:4  
 116:8 122:13 185:7  
 203:9  
**officer** 2:8 5:11 10:9  
 104:4 136:18  
**offices** 12:16 171:6  
**officially** 137:17  
**offs** 12:7 238:19  
**offset** 42:20 116:5  
 118:10  
**offsite** 64:7,18 167:18  
 168:16 169:18,22  
 170:3,5  
**oil** 20:19  
**Oklahoma** 242:10,11  
**old** 138:9 224:4  
**older** 7:1 13:22 19:4  
**oldest** 71:18 75:3 219:8  
**Oldner** 1:22 65:10,12  
 65:13  
**Olesiuk** 2:5 3:5 9:17  
 106:13  
**once** 195:2,21  
**ones** 76:22 77:2  
**ongoing** 155:22  
**online** 76:6 98:3 110:5  
 161:17 226:22 227:1  
**onset** 82:6 114:7  
 224:21  
**onsite** 65:3 196:7  
**open** 1:5 19:8 32:6,8

42:4 47:18 60:4,7  
 67:22 76:5 81:11,13  
 88:12,14,15 96:20  
 97:17 98:6 139:11  
 145:1 149:3 150:5  
**opened** 11:22 48:17  
 91:3 94:11  
**opening** 97:2 103:5  
 117:17 150:18 187:2  
 197:5 231:15  
**openness** 148:6,8,19  
**opens** 186:14  
**operate** 42:7 43:14 48:8  
 48:18  
**operated** 103:12  
**operating** 47:16 75:3  
 217:20  
**operation** 45:3,7 218:2  
 224:3  
**operational** 103:9  
**operations** 19:9 105:5  
 131:19 164:9 168:10  
 236:7  
**opinion** 36:15 79:5  
**opinions** 172:17,21  
**opportunities** 18:4  
 75:15 144:15 160:2  
 163:12 227:3  
**opportunity** 18:7 22:4,5  
 24:7 31:16 36:17  
 42:12 46:8,16 51:4  
 56:10 58:18,20 65:7  
 73:19 74:15 77:6,9  
 91:19 95:14 104:13  
 132:8,10 137:7  
 138:14 140:12 143:4  
 143:6 144:21 168:19  
 210:6  
**opposed** 153:17,18  
**optimism** 59:21 85:6  
 86:10 88:11 89:16  
 105:8 130:8  
**optimistic** 4:22 21:19  
 46:5 60:11 68:21  
 95:10,11 239:14  
**option** 43:3 76:8  
**optional** 162:19  
**options** 75:10 76:7,11  
 168:6 211:5,14,21  
**order** 84:16 148:14  
 209:14  
**Oregon** 242:13  
**organization** 5:18  
 141:5 142:9,11  
 155:20 160:20 161:2  
 165:11  
**organization's** 131:12  
**organizations** 19:10

30:6 39:21 49:16  
 153:12 160:17 197:18  
 198:4,7 208:2  
**original** 42:4 49:14  
 214:16,19 215:19  
**originally** 90:5  
**originate** 65:22 99:2  
**originated** 15:22 33:19  
 77:2  
**originating** 222:22  
**origination** 15:6 66:18  
**originations** 223:1,2  
**Ottumwa** 95:21,22 96:4  
**outbreak** 113:12 120:12  
**outcome** 27:11  
**outcomes** 28:12 227:14  
**outdoor** 97:5  
**outflows** 219:10  
**outgoing** 21:6  
**outlining** 133:14  
**outlook** 5:1 28:22 37:18  
 46:4 101:22 130:9  
 239:13  
**outlooks** 108:12 228:12  
**outpaced** 14:15 118:13  
**outperform** 68:3  
**outperformed** 234:4  
**output** 108:13  
**outreach** 114:21 237:21  
**outset** 120:5  
**outside** 45:21 146:15  
 148:9  
**outsized** 166:21 220:13  
**outstanding** 19:19  
 38:20 40:7  
**overall** 6:5 21:5 26:22  
 27:10,12 32:15 33:7  
 45:17,20 46:4 60:8  
 64:3,4,20 65:4 81:16  
 89:10 92:2 95:9  
 110:13 115:6 117:19  
 119:2 215:12,21  
 220:13 231:11 232:21  
 233:20 239:8,16  
**overbanked** 94:8  
**Overbidding** 14:22  
**overview** 164:20,21  
 165:4  
**owned** 59:6 140:10  
**owners** 23:20 33:16  
**ownership** 31:6  
**owning** 35:3

---

**P**

---

**P-R-O-C-E-E-D-I-N-G-S**  
 4:1  
**p.m** 1:10 4:2 126:8,9  
 243:4

**pace** 69:15,22 88:18  
 113:17 114:5 115:2,8  
 225:19  
**package** 63:16  
**pages** 191:14  
**paid** 34:13 100:17  
 186:15  
**palatable** 81:10 83:5  
**Palm** 6:22 36:19 37:2  
 40:5  
**pandemic** 6:5 14:10  
 15:22 17:10,13,20  
 20:15 21:9 29:11  
 42:11 47:17 49:2  
 60:18 67:11 69:20  
 76:4,15 90:14,16,21  
 93:10 98:9 107:10  
 110:16 111:11,21  
 114:8,11,12 115:15  
 117:18 118:2,12  
 120:5 122:19 130:8  
 133:12 134:1 164:21  
 165:5,11 169:20  
 170:15 203:6 215:5,7  
 231:4 241:13  
**pandemic's** 8:4  
**pandemic-related**  
 49:17 166:22 169:14  
**panel** 153:5 164:19  
 236:19 237:6  
**paper** 212:7 214:1,14  
 228:17,20 229:9  
 233:5 235:4 236:12  
**papers** 219:19  
**pardon** 112:4 123:21  
**parent** 128:9  
**parents** 177:7  
**part** 13:6 21:2 22:7  
 27:13,13 34:13 35:9  
 47:3 59:3 60:6,17,18  
 61:10,19 63:16,20  
 65:2 71:10 73:2 85:13  
 96:2 138:8 154:8  
 155:22 156:4 158:12  
 175:22 177:11 183:2  
 185:5,10 190:20  
 191:9 194:11 195:4  
 196:10 202:1 211:5  
 212:4,12 237:13  
**partial** 205:7  
**participant** 91:17  
**participants** 106:15  
**participate** 4:9 9:4 22:6  
 31:17 46:17 49:10  
 95:14 194:15  
**participated** 26:15  
 76:17 94:20 161:19  
**participating** 46:20

74:2 95:15 99:1  
**participation** 75:12  
 96:15 167:7 197:16  
 241:2,15  
**participations** 35:12  
**particular** 8:9,21 67:7  
 94:2,17 177:1,2 187:1  
 187:14  
**particularly** 42:15 70:9  
 92:17 93:8 107:15  
 109:4,17 122:11  
 188:21 197:13,20  
 199:22 203:6 221:15  
**parties** 27:11 177:10  
**partner** 27:9 41:17  
**partnered** 34:8 148:3  
**partnering** 146:22  
 153:11  
**partnership** 27:2  
**partnerships** 30:16  
 128:20  
**parts** 43:18 101:19  
 114:14 175:6  
**party** 176:2,5 177:14,18  
 177:22 178:3,7  
 181:11,22 182:1  
**pass** 138:14 148:19  
 205:18  
**passed** 149:1  
**passions** 78:13  
**patience** 69:3 126:15  
 151:7  
**patterns** 21:7  
**Patty** 1:17 18:12  
**Paul** 79:18 82:2,4 86:20  
**pause** 125:3 136:1  
 145:8 168:6  
**paused** 167:22  
**pauses** 168:6  
**pay** 110:6 161:18  
 180:20 187:12 236:6  
**paycheck** 167:1 211:18  
 211:18  
**paying** 102:14 122:10  
 176:4  
**payment** 117:2 205:3  
**payments** 16:13 34:17  
 34:18 62:3 101:11  
 102:3 160:12 212:1  
**pays** 181:21  
**PCA** 202:17  
**Peace** 155:10  
**peak** 49:1 109:13  
**peaked** 31:22 234:10  
**Pearce** 210:19,20  
**peers** 29:6 72:20  
**penalties** 193:6  
**pencil** 45:8

**pent** 115:9  
**people** 12:17 24:15,18  
 33:6 35:3,19 39:19  
 41:5 42:12,14 43:3  
 44:14 46:1 55:1 59:10  
 59:15 66:5 73:4 82:1  
 82:13,15 83:6 84:6  
 87:3 88:22 91:13  
 92:17 93:1 95:9 97:7  
 139:5,15 141:19  
 142:1,8,10 147:13  
 154:13,19 158:10,20  
 159:16,22 160:7  
 211:17 242:7  
**People's** 142:20  
**Peoples** 103:9  
**perceive** 20:12  
**perceived** 153:20  
**percentage** 171:7  
 225:12  
**Percentages** 48:7  
**percentile** 239:2  
**percentiles** 238:8  
**perception** 58:2  
**Perfect** 121:11  
**performance** 85:1  
 115:6 117:1 119:21  
 122:22 214:12 215:10  
 216:7 233:13  
**performed** 18:18  
 215:13 235:18  
**performing** 225:4  
**period** 8:10 69:12 80:5  
 120:19 194:16 200:15  
 214:14 221:14,22  
 224:18 228:22 229:21  
 230:2,12,21 234:5  
 237:6  
**periods** 229:17  
**permanent** 195:4  
 196:17  
**permission** 38:15  
**permitted** 179:7  
**persist** 229:13  
**person** 7:7 27:15 33:11  
 33:12 65:1 155:19  
 174:15,17 175:19  
 176:10,11,13,20  
 177:20 208:17  
**personal** 76:9 79:4  
**personnel** 21:4  
**perspective** 122:22  
 140:10  
**perspectives** 107:1  
 157:1  
**phase** 29:14 191:10  
 192:20 193:17,18  
**phenomenal** 86:17

**Philadelphia** 116:18  
 117:4  
**philanthropic** 132:2  
**phone** 124:14  
**physical** 185:3  
**pie** 138:6  
**piece** 201:6  
**pieces** 124:1  
**Pierre** 59:14  
**pill** 159:12  
**pilot** 165:2 189:5 191:4  
 191:20 192:21 193:13  
 193:18 194:11 196:15  
**pipeline** 20:3  
**pique** 229:19  
**piqued** 237:13  
**pitch** 162:7  
**Pitkin** 1:17 13:1,2  
 147:21,22 151:13  
 207:16,18 210:13  
**Pittsburgh** 116:19  
**pivot** 168:15 170:2  
**PJ** 22:10 27:17 157:18  
 161:6,7  
**place** 29:14,15 54:9  
 80:9 82:18 103:2,11  
 107:9 155:2 178:5  
**placed** 177:5 178:9  
 180:6,19  
**placement** 174:16,22  
 175:21 176:9,10  
 177:15 179:9 181:19  
**places** 42:14 67:14 82:8  
 144:13 175:9 177:19  
 180:18  
**placing** 174:15,22  
 175:14,21 180:19  
 181:11  
**Plains** 233:9  
**plan** 66:14 68:14  
**planned** 25:16  
**planning** 170:16 196:7  
**platform** 128:19  
**play** 223:8 227:7  
**playing** 166:21  
**plea** 54:21  
**please** 27:22 112:13  
 121:5,10 126:1  
 138:21 145:2,4  
 171:11 173:9 174:7  
 178:13 181:6 188:10  
 190:7 192:17 194:9  
 197:1 213:4 219:20  
 221:17 223:5 224:18  
 226:15 228:14 229:13  
 231:12 233:10 235:3  
 236:11 238:1  
**pleased** 4:18 7:7 10:18

15:19 22:12 27:3,7,13  
 37:3 39:12 41:8 57:21  
 65:15 148:5  
**pleasure** 22:7 28:6  
 95:13  
**plentiful** 50:12  
**plummeted** 231:8  
**plus** 32:16 184:3,5,6  
 201:11,12  
**podcasts** 150:3  
**point** 14:16 28:21 39:13  
 43:4 82:16 89:17  
 106:8 119:16 124:6  
 141:8 159:5 173:1  
 185:12 190:4,9  
 223:19 236:12  
**points** 127:15 184:2,3,6  
 184:7 201:12,13  
 216:3,4,16  
**poised** 17:1  
**poke** 154:22  
**policy** 6:1 114:8 135:6  
 135:9 142:11 169:5  
 208:10 209:9 226:6  
**Political** 95:4  
**polling** 30:4  
**Polson** 7:3 42:1 129:13  
**pop** 88:21  
**populated** 90:7  
**population** 21:5 47:10  
 48:7 66:9 73:5 75:20  
 96:18 97:10 148:13  
 218:21 219:17  
**populations** 59:9 75:11  
**portfolio** 20:8,13 32:15  
 32:16 33:1 53:7 59:11  
 66:3 68:20 72:7 100:6  
 101:7 102:21 103:5  
 132:19  
**portfolios** 107:15  
 219:14 220:18  
**portion** 44:7 169:21  
 200:1 231:17  
**ports** 47:13  
**posed** 71:2  
**poses** 64:1  
**position** 17:5 111:12  
 240:2  
**positioned** 122:19  
**positive** 10:22 28:12,22  
 29:7 60:1 80:17 81:15  
 85:7 88:18 89:10  
 101:22 108:12 118:19  
 134:10 228:12 229:2  
**positives** 24:15  
**positivity** 32:1 97:15  
**possibility** 209:11  
**possible** 47:21

**possibly** 61:8 212:22  
**post-** 69:11  
**post-1984** 217:7  
**post-COVID** 69:6  
**post-crisis** 216:14  
**post-pandemic** 107:13  
**postal** 208:22 209:4  
**posted** 172:3 185:16,19  
**posting** 167:9  
**potential** 122:10 134:20  
 152:22 190:19 197:19  
 198:3 226:4 227:14  
**poultry** 67:7  
**Powell** 156:10  
**power** 94:1 143:8  
**PPE** 178:16 179:11,15  
 179:17,20 180:12  
 181:14,17 182:2  
**PPP** 12:4,5 16:1,8 19:17  
 20:1 23:10 26:12 30:4  
 30:8 33:17 39:3,13  
 40:4,14,21 41:4,6  
 43:11 44:5 49:11,22  
 56:18 60:21,21 61:2,6  
 61:10,11 66:19 67:2  
 73:8,9 76:17 77:3  
 80:11 87:9 91:16 99:1  
 99:5,8,10,16 101:1  
 102:2 105:12 118:9  
 123:3 130:13 167:1,4  
 167:8 197:14,16  
**PPP-1** 23:15 24:4,9  
 25:13  
**PPP-2** 25:8,12  
**PPPs** 56:19 57:5 62:10  
**practices** 114:20  
 117:21 123:11 128:20  
 130:21 131:6 135:15  
**Prairie** 58:21 59:5  
**pre-** 115:14 160:11  
**pre-boom** 234:12  
**pre-COVID** 37:7 54:17  
 80:16  
**pre-Depression** 52:1  
**pre-exam** 196:6  
**pre-pandemic** 108:10  
 109:9,15 110:9  
**pre-tax** 215:15 216:2  
**preach** 144:22  
**preamble** 172:3  
**preceded** 231:19  
**precipitation** 45:10  
**precipitously** 231:21  
**precommissioned**  
 171:7  
**predominantly** 222:13  
**predominately** 28:13  
 47:9

**prepaid** 181:2  
**prepared** 68:13 138:21  
**presence** 185:3 226:2  
**present** 1:12 2:4 19:5  
 20:7 27:8 188:22  
 213:9  
**presentation** 131:14  
 132:12 240:10  
**presentations** 8:13  
**preserve** 68:16 128:17  
**President** 6:14,16,18  
 6:20,21 7:2,4 13:2  
 18:12 46:12 51:7,17  
 58:21 71:13 74:10  
 90:1 95:21 242:12  
**presiding** 1:11  
**pressure** 26:12,19  
 94:16 118:10 130:12  
 143:3 230:15  
**pressures** 67:6 140:18  
**pretty** 33:7 48:1 61:14  
 64:3,3 81:7 87:6  
 91:14 92:1,2 95:11  
 100:11 110:2 122:17  
 207:10 211:3 215:13  
**prevalent** 114:15  
**previous** 14:19 87:11  
**previously** 171:5  
**price** 14:13,17 45:3  
 85:20 110:20 117:9  
 159:5 230:3 231:19  
 232:5,13,15,19  
**prices** 11:8 20:19 43:4  
 62:4 81:19 82:14  
 101:16 102:3,5 110:7  
 110:8,14,22 230:9,15  
 230:16,18 231:7,10  
 231:21 232:2,6,17,21  
 233:3 234:17,22  
 236:17  
**pricing** 85:19 86:6  
 102:7,9  
**primarily** 13:8 16:10  
 18:19 19:13 44:10  
 46:2 90:5 95:7 111:17  
 154:11 215:21  
**primary** 5:5 175:11  
 178:1,16,22 179:2,6,7  
 214:9  
**prime** 79:20  
**principle** 226:3  
**principles** 4:16 198:10  
**prior** 50:8 55:10 114:12  
 115:21 116:1,5  
 118:12 156:15 168:16  
 169:19 215:16 217:4  
**private** 66:5 151:8  
**privilege** 36:20

**proactive** 44:13 48:13  
**proactively** 38:15  
**probably** 25:21 44:10  
 56:1 59:11 145:19  
 156:10 158:4 160:12  
 191:15 211:19  
**problem** 35:21 57:16,19  
 160:21  
**problematic** 202:8  
**problems** 39:11 68:12  
 72:14 113:1 126:20  
**procedures** 182:9  
**proceed** 79:2 103:5  
**proceeds** 85:21  
**process** 12:5 19:20  
 41:7 50:4 52:15 54:19  
 57:8 58:6 64:19 76:1  
 87:17 89:5 103:22  
 104:7 122:16 142:1  
 153:5 160:11 173:7  
 179:18 182:12,17  
 183:3 184:15 189:13  
 192:11 194:17 195:2  
 196:6  
**processed** 19:22 99:6  
**processes** 56:3 154:21  
 160:10  
**processing** 103:10  
 154:13 158:21  
**processor** 52:4  
**producers** 45:16 61:15  
 61:15  
**production** 91:4 102:10  
 224:15 230:6,20  
 234:21  
**productive** 11:9  
**products** 50:17 54:3  
 85:16 143:20 184:4  
 210:8  
**profess** 148:11  
**profile** 135:19  
**profit** 83:19  
**profitability** 228:13  
**profitable** 219:4  
**program** 7:11 12:6  
 31:17 38:21 39:4,5,5  
 39:6,22 40:2 44:6  
 49:11 77:8 99:1,17  
 101:13,13 102:2  
 127:19,20 133:6,14  
 133:17 134:19 154:15  
 155:9,16 160:3  
 161:20 162:5,10  
 165:2 166:22 167:1  
 168:1 177:11 181:2  
 191:9 222:21  
**programmatic** 150:15  
**programs** 35:13 49:5

99:17 120:22 130:12  
 134:8 144:9 168:11  
 180:9 207:1  
**progress** 111:18  
**progresses** 198:14  
**progressively** 38:1  
**project** 195:13 196:1  
**projected** 113:20  
**projecting** 25:12  
**projects** 213:19 214:4  
**promote** 5:6 128:18,19  
**prong** 176:19  
**pronounced** 82:20  
**proper** 48:19  
**properties** 14:18 87:3  
 92:21 93:1 110:14  
**property** 110:7,8,19,22  
**proposal** 5:17  
**propose** 177:16  
**proposed** 132:21 135:5  
**proposes** 55:20  
**proposing** 176:21  
**prosperity** 230:12  
**protect** 41:14 139:9  
 142:17 143:17 153:14  
**protection** 2:12 110:11  
 120:3 164:12 167:1  
 168:12  
**protocols** 13:12 48:1,6  
 48:19 170:16  
**prototyping** 5:15  
**proud** 39:16 65:15 72:2  
 93:5,10 98:21  
**proved** 36:10  
**proven** 241:3  
**provide** 13:8 115:18  
 127:12 128:8,19  
 131:19 132:8 164:1  
 168:7 177:10 179:20  
 194:20 196:5,11  
 201:15  
**provided** 26:11 39:13  
 77:9 133:20 165:6,14  
 166:10 169:10 170:5  
 170:9 172:12 210:4  
**Providence** 90:6  
**provider** 161:15  
**providers** 152:20 220:6  
 221:16  
**providing** 21:21 104:2  
 167:11 198:10 201:10  
**provision** 102:17,22  
 199:7  
**provisions** 118:6  
**provoking** 149:5  
**proximity** 74:22 76:12  
**prudent** 165:17  
**public** 1:5 97:4 114:8

135:7 151:10 190:22  
**publicly** 206:10  
**published** 213:22 214:1  
 214:8 219:19 228:16  
**Puerto** 113:10  
**pulling** 196:9  
**punching** 167:6  
**purchase** 86:22 87:1  
**purchased** 90:17  
**purchases** 99:14  
**purpose** 71:2,5 159:5  
 172:15 175:11 178:1  
 178:16,22 179:3,6,8  
 192:2 227:13  
**purview** 146:15  
**pushing** 30:19  
**put** 22:15 23:7 36:7  
 40:3 86:7 108:12  
 141:4 155:2,14 157:9  
 205:6  
**Putnam** 90:18  
**puts** 52:22  
**putting** 230:14  
**puzzle** 201:6

---

**Q**


---

**Q&A** 167:16,20  
**Q&As** 172:4  
**qualify** 77:5 180:9,12  
 181:2  
**qualifying** 180:9 181:4  
 198:7  
**quality** 4:17 17:11  
 25:20 50:21 63:1 68:8  
 92:15 102:11 117:20  
 119:15,20 203:16  
 204:4 216:12 239:9  
**quarantined** 24:15  
**quarantines** 81:15  
**quarter** 11:21 12:2  
 16:19 25:22,22 34:1  
 37:17 52:21 56:11  
 77:22 107:21 108:11  
 108:12 167:2 224:11  
 224:12 228:15 235:12  
 239:1,3  
**quarterly** 180:11  
 213:22 224:16  
**quarters** 224:12  
**quartile** 219:8  
**quartiles** 218:14,18  
**question** 108:9 145:13  
 145:17 148:1,17  
 149:8 154:1 155:15  
 158:15 162:1 167:13  
 198:16,18,21 199:1  
 199:12,12 201:22  
 203:4 207:16,17

208:7,9,11 209:17  
**questions** 35:4 87:21  
 125:4,10,12 135:21  
 136:2,8 137:18  
 138:20 145:9 151:16  
 162:22 166:3 167:9  
 167:10 169:1 172:5  
 188:5,10 196:20  
 197:1,11 207:2 240:4  
 240:6  
**quick** 51:20 113:2  
 117:16 196:13 214:22  
**quicker** 212:6  
**quickly** 32:2 66:17  
 78:11 87:10,12 92:1  
 118:22 124:16 157:14  
 168:16 170:2 185:21  
 188:1,17 192:15  
 234:3 240:12  
**quirk** 202:16  
**quite** 19:21 21:4 22:17  
 22:18 72:8 86:11,15  
 117:7 119:11 189:19  
 200:21 241:3

---

**R**


---

**Rae-Ann** 2:10 3:13  
 164:6 171:8 188:16  
 204:3 205:20  
**rail** 116:6  
**rain** 32:19  
**raise** 125:13 138:22  
 197:1  
**raised** 125:16 136:9  
 167:14 197:5  
**raises** 186:15  
**ran** 235:20  
**ranchers** 61:3  
**range** 16:9 60:12 129:4  
 198:11 210:3,10  
 220:20 233:19  
**ranged** 57:5  
**ranging** 16:5 48:9  
**ranking** 52:6  
**ranks** 14:2  
**Ransomware** 156:5  
**Ransomware's** 156:6  
**rapid** 5:15  
**rapidly** 5:9 43:20  
**rate** 13:20 19:14,14  
 32:1 34:10 37:6,8  
 42:22 50:11,17 55:6  
 80:16,16,20 83:4  
 84:13 96:7,10 109:12  
 118:20 119:2,4,5,7  
 164:22 171:15 182:4  
 183:8,12,14,17,17,20  
 183:22 184:1,2,5,6,9  
 184:12,13,16,18,22  
 185:1,2,5,7,16,17,22  
 186:10,11,15 187:13  
 200:9,22 201:5,8,10  
 201:11,12,19 216:13  
 216:16,21 217:10  
 238:11 239:2,3  
**rates** 15:2 20:10 48:3  
 50:16 68:15 75:12  
 81:17 86:8 96:14,16  
 97:15 99:12 100:12  
 100:14 114:2 118:14  
 122:13 171:18 174:3  
 176:14,18 185:8,13  
 185:14 204:9 219:4  
 227:1 232:8 239:18  
**rating** 119:13 123:4,7,9  
 204:9  
**ratings** 119:18 120:1  
 123:9,17 192:22  
 204:16  
**ratio** 26:13,16 63:10  
 197:6 228:10 237:7  
**ratios** 17:9 134:14  
 135:2 202:15 219:15  
 238:4  
**raw** 85:16  
**reach** 30:16 59:1 66:15  
 108:9 137:13 145:4  
 229:19 234:14  
**reached** 38:13 57:17  
 203:9 215:19 216:14  
**reaching** 29:20 30:9  
 39:19 215:16  
**reaction** 237:14  
**read** 145:19 206:10  
**readiness** 11:5  
**ready** 125:17  
**real** 8:20 20:5,8 33:1  
 41:10 45:3 68:19 73:6  
 81:19 82:14 93:16  
 99:17 101:17 107:16  
 109:20,21 110:22  
 111:6 114:14 117:8  
 117:16 122:6 160:12  
 188:17 205:15 210:11  
**reality** 58:2 161:10  
**realize** 77:8  
**reason** 8:16 176:6  
 189:4  
**reasonable** 18:3  
**reasons** 30:11 41:5  
 53:15 87:20 104:21  
 239:13  
**rebound** 11:2 46:6  
**rebounced** 37:10 122:4  
**rebranded** 66:13  
**recalculate** 185:8

**receipt** 166:15  
**receipts** 234:20  
**receive** 17:6 41:6 85:4  
 179:15  
**received** 12:14 23:20  
 38:22 48:8 76:2 97:8  
 101:12 134:10 168:7  
 174:9 188:4 191:6  
 201:3 230:17  
**receiving** 14:4 188:19  
**recession** 38:2,4  
 110:19,21 235:20  
**recognize** 135:11 159:7  
 159:21 205:1  
**recognized** 136:20  
**recognizing** 168:2  
 204:11 212:3  
**recommend** 90:20  
 156:18  
**recommendations**  
 128:8 129:16 163:13  
 189:11 195:18  
**record** 11:8 15:5 44:20  
 91:9,10 126:8,9  
 225:19 231:8 232:3  
**records** 83:18 185:9  
**recovered** 122:1  
**recoveries** 94:18  
 231:10  
**recovery** 69:12 113:21  
 114:5 115:1,7,10,11  
 121:20  
**recruiting** 160:7  
**reduce** 165:21 198:6  
**reduced** 42:20 203:19  
**reductions** 225:13  
**refer** 182:8  
**referred** 24:9  
**refers** 239:20  
**refinance** 15:5 86:21  
 93:13 131:8  
**refinances** 99:13  
**refocus** 143:15  
**refreshing** 149:3  
 151:20  
**refund** 34:20  
**reg** 172:2  
**Regan** 51:11  
**regard** 30:20 45:1 93:10  
 137:2 203:16  
**regarding** 15:18 132:8  
 135:6  
**regardless** 14:1 205:3  
 222:14  
**regards** 148:17 209:11  
**region** 2:6,7 10:2,3 47:6  
 73:21,22 109:15,16



111:10 113:8,11,17  
 114:1,6,10,13,17  
 115:2,6 116:14 117:8  
 117:11,18 118:8,11  
 118:13,15,21,22  
 120:7,12,16,19  
 121:13,20 122:9  
**regional** 9:18 10:1,3  
 38:13 106:22 113:19  
 116:22 169:2 185:7  
 213:11  
**Regionally** 117:10  
**regions** 233:8,13,18,19  
 234:1,4,8  
**regular** 169:3  
**regulation** 171:21  
 182:18 185:10,18  
 200:20 202:16 226:6  
**regulations** 171:15  
 172:9 173:2 182:14  
 183:13 188:3 226:10  
**regulator** 64:22 154:5  
 157:5  
**regulators** 4:19 41:14  
 64:10 69:8 71:7  
**regulatory** 5:4,6 17:7  
 52:8,19 65:5 69:2  
 70:14 78:20 79:5  
 133:4 142:3 147:5  
 167:11,12 178:18  
 179:5 198:6 214:19  
 224:20,21 225:5  
 226:12 228:14  
**rehired** 171:4  
**reigned** 237:3  
**reinvest** 143:14  
**reinvestment** 15:16  
 18:4  
**relate** 154:2  
**related** 9:9 17:13  
 114:20 186:4 211:14  
**relates** 162:10  
**relationship** 157:5  
 174:15,17 175:19,22  
 176:2 179:9 203:8  
 210:6,9  
**relative** 28:19,19  
 110:19 123:17 203:22  
 228:8  
**relatively** 80:12 84:3  
 86:2 87:10,12,13  
 101:20 108:4 225:6  
 232:10  
**released** 26:8  
**relevant** 9:15 166:2  
 225:1  
**reliable** 98:11  
**relief** 49:17 167:12,15

**relies** 153:11  
**relocated** 82:9  
**rely** 182:2 184:12 212:7  
**relying** 172:17  
**remain** 11:7 17:16  
 19:15 53:11 92:16  
 120:16 174:4  
**remained** 10:21 47:18  
 76:5 77:4 101:19  
 222:6 237:9 238:20  
**remaining** 11:10 123:17  
**remains** 6:7 13:11  
 16:22 17:12,18 19:7,8  
 19:20 21:10 92:15  
 109:17,21 116:8  
 119:7 239:21  
**remarkable** 15:7,19  
 76:4  
**remarkably** 8:10  
**remarks** 3:2,21 7:17  
 117:17 213:7 231:15  
 239:11  
**remember** 11:22 141:3  
 171:16 173:18 179:2  
 186:8 206:1  
**remind** 128:3  
**reminded** 232:11  
**reminder** 185:21  
**remiss** 215:4  
**remote** 13:14 161:16  
**remotely** 42:13 48:22  
 82:6,10  
**remove** 6:1  
**remuneration** 180:21  
**rent** 117:3 230:8  
**rental** 83:4 117:2  
**rentals** 84:15  
**Renters** 117:3  
**rents** 101:18  
**reopen** 12:17 95:10  
**reopened** 32:11  
**reopening** 11:11  
**repaid** 205:2  
**repayment** 205:6  
**repeat** 193:6,9 237:18  
**replace** 5:16  
**replaced** 217:9  
**report** 15:19 48:11 51:5  
 55:13 135:20 136:6  
 173:3 189:4,10,16  
 191:3,6,12,16 192:4,7  
 192:13 193:5,13,19  
 194:3,18 195:10,11  
 195:16,16,22 196:1,5  
 196:9,14 215:20  
 222:2 223:4 236:1  
**report's** 190:11 196:2  
**reported** 20:15 55:7

130:10 182:19,20  
 188:18 215:14 216:14  
 216:16 224:16  
**reporting** 128:13  
**reports** 5:16 128:11  
 130:6 173:4 180:11  
 189:19 190:2 193:4  
 195:5 222:8,9  
**represent** 129:7  
**represented** 129:10  
**representing** 16:7  
 129:2 235:11  
**represents** 72:6 231:16  
 233:16  
**Republic** 142:21  
**reputational** 153:2  
**request** 16:3 79:5  
 184:17  
**requesting** 17:13  
**requests** 49:13  
**require** 97:4 135:10  
 181:9  
**required** 34:12 83:4  
 166:17 180:10 181:5  
 185:18  
**requirement** 161:11  
 197:20  
**requirements** 134:6  
 142:3 168:13 173:12  
**requires** 78:22 128:7  
 180:14 200:22  
**research** 2:6,13 3:17  
 9:20 213:12,13,20  
 225:9 227:2  
**reserve** 23:10 198:3  
**reserves** 68:17  
**residence** 43:21  
**residency** 14:1  
**residential** 14:12,18  
 15:3 28:14,20 33:1  
 91:12 99:17 117:8  
 225:10  
**residents** 14:3,6 76:8  
 82:17 84:16  
**resilience** 107:6 140:15  
 141:8 156:3  
**resiliency** 122:20  
**resilient** 11:13 54:5  
 62:1 121:13 140:21  
 239:9  
**resolve** 87:22  
**resort** 22:22 26:6  
**resorts** 23:21 80:3  
**resources** 104:3 160:14  
 162:15 188:1,8  
**respect** 30:3 202:17,20  
 225:8  
**responded** 229:12

236:16  
**responders** 49:20  
**responding** 168:2  
**response** 4:18 5:4  
 114:8 164:20 165:4  
 166:8 169:5 222:11  
**responses** 167:9  
 227:18  
**responsibilities** 170:12  
**rest** 45:18 46:15 65:8  
 74:8 89:15 115:3  
 238:5 242:18,20  
**restates** 135:9  
**restaurant** 62:13 84:21  
 102:21  
**restaurants** 11:11  
 23:21 32:11 33:16  
 37:12 44:2 83:21 84:2  
 92:10 115:13  
**restitution** 193:10  
**restricted** 201:17  
**restriction** 164:22  
**restrictions** 19:9  
 171:15,17 173:17,19  
 174:4 182:4 183:9,12  
 183:15 186:4  
**restructured** 39:7 84:20  
**restructuring** 205:4  
**restructurings** 166:9  
**result** 14:16 17:10 50:9  
 67:11 100:18 114:19  
 115:7 161:19 230:21  
**resulting** 42:22 96:19  
**results** 42:17 195:18  
 227:16  
**resumed** 49:4  
**retail** 108:7 110:14  
 115:10 220:21  
**retailers** 115:14  
**retain** 209:15  
**retired** 104:4 171:5  
**retirees** 55:1  
**retirement** 24:19  
**retroactively** 34:16  
**return** 11:12 63:3 68:4  
 207:2  
**returns** 230:13  
**revenue** 83:18  
**review** 132:11 171:2  
 172:2 182:21  
**revised** 174:19 176:8  
 179:11 183:11 186:3  
**revisions** 174:13  
**revolutionary** 152:6  
**rewards** 70:3  
**rework** 205:9  
**RFI** 141:4  
**RFIs** 150:18

**Rhode** 6:16 90:4,8,10  
91:3 92:2,8 94:6 95:4  
95:12  
**Rice** 6:14 79:15  
**Rico** 113:10  
**ridership** 115:20,21,22  
**rioting** 82:5  
**riots** 28:13  
**rise** 231:18  
**rising** 236:9 237:14  
**risk** 2:9,10,11 8:18 9:18  
20:6,13 36:7 114:20  
117:21 120:21 123:5  
135:14,18 153:2  
164:4 189:20 190:2  
190:17,18 192:19  
194:4 204:11 206:14  
206:14,18 207:10  
209:9 213:11 239:21  
**risk-based** 78:4  
**risks** 70:3  
**River** 13:2 15:19 17:11  
18:8 59:13 147:22  
**ROA** 215:15  
**road** 21:15  
**ROAs** 216:2  
**Robert** 131:1  
**robust** 15:8 18:19 92:17  
201:15  
**ROC** 36:4  
**roiled** 231:4  
**role** 31:9 77:11 138:14  
166:21 223:8 224:2  
227:7  
**Ronald** 51:11  
**rose** 230:9 232:21  
234:3 237:12  
**roughly** 223:9  
**round** 19:16 20:1 33:21  
33:22 40:14,16 49:11  
49:12,14 50:3 61:2  
73:9,11 76:18,21 77:2  
87:9 102:2  
**roundtable** 73:22  
129:22  
**Rudolph** 2:7 3:8 46:15  
127:22 128:2  
**rule** 133:13 166:3 169:7  
172:19 174:19 175:15  
176:8 178:21 179:11  
179:13,17 183:4,11  
186:3,12  
**rulemakings** 4:19  
169:15  
**rules** 77:14 182:16  
**run** 83:3 85:9 118:22  
154:14 213:5 233:1  
**running** 55:22 80:19

81:7,18 85:12 87:10  
97:15 159:17 212:22  
225:9  
**runs** 96:8 154:16  
172:13  
**rural** 51:18 53:1 59:9  
158:6 208:17 219:11  
219:17 221:6 223:16  
**Rushmore** 62:16

---

**S**

---

**Sabal** 6:22 36:19 37:2  
40:5  
**safe** 10:21 21:21 44:14  
48:19 76:16 144:3  
153:19,20  
**safety** 4:16 13:12 27:4  
47:22 48:5,15 64:7  
78:1 119:19 168:11  
198:9  
**sale** 21:1  
**sales** 14:9,12,13,15  
76:6 108:7 117:12  
**Salish** 44:12  
**San** 47:6 73:22  
**Sandy** 242:12  
**Sarah** 1:19 31:18  
208:11  
**Sarasota** 6:22 36:19  
40:7 151:19  
**sat** 143:9,10,11  
**satisfactory** 117:21  
120:21 192:22  
**Savannah** 131:4  
**saving** 16:2,12  
**Savings** 95:21  
**saw** 18:15 78:9 109:2  
110:21 118:15 119:22  
121:3 140:6 203:1  
224:13 230:2 232:17  
233:2  
**saying** 62:1 86:13  
111:11 124:5  
**says** 108:11  
**SBA** 19:20 34:3 50:3  
57:7 87:11,19 167:8  
222:20,21  
**scale** 119:13 226:2,5  
**scary** 22:17,19 153:9  
**scenario** 38:4 83:16,16  
207:1  
**scenarios** 134:22  
**scenes** 169:17  
**schedule** 65:13 67:3  
73:14 97:20 170:10  
**scheduled** 27:18 51:6  
**scheduling** 34:4 165:21  
**school** 88:15,17 97:22

**schooling** 49:4  
**schools** 11:10 32:8  
49:4 88:12  
**scope** 226:7  
**scoped** 190:17  
**seamless** 144:3  
**season** 21:10 121:15  
**second** 5:16 20:1 29:14  
33:21,22 34:2 37:16  
40:13 49:11 55:12  
61:2,5,9 73:11 76:2  
88:3,5 99:7 108:12  
140:15 156:2,3 160:9  
167:2 216:12 217:8  
221:18 229:9 239:12  
**seconds** 137:21  
**section** 173:11,12  
183:5,6,13  
**sector** 38:6 53:20 72:6  
92:7 101:9,16 102:1  
109:5,5,8,10,20 110:3  
114:16 115:11 116:8  
132:9 134:15 141:14  
146:18 151:8 160:6  
223:9,10 224:10  
228:18 229:2,11  
230:2 231:2,4,11  
235:21 236:5 239:14  
**sectors** 37:14 47:14,16  
50:14,15 102:21  
103:1,4 122:2 143:1  
**secure** 144:3 155:12  
224:17  
**security** 6:19 31:19  
74:11 75:2 184:2  
242:10  
**seed** 230:7  
**seeing** 9:2 12:16 29:4,8  
30:2,13 31:6 43:1,17  
44:9 53:21 59:22  
61:17 62:7,15 73:16  
74:4 94:3 108:6,17  
119:10,12,14,17  
120:9 125:16 144:8  
147:5,15 161:14  
203:22 204:4,7,8,8,13  
242:17  
**seeking** 81:1 83:7  
181:16  
**seen** 21:10 29:19 30:4  
50:17,21 60:19 77:18  
89:6 93:22 100:10,18  
100:22 109:7,15  
113:16,17 115:10  
116:3 118:1 123:8,13  
152:20 238:20,22  
**segment** 130:18  
**segments** 110:1

**segregate** 102:20  
**self-** 88:6 236:6 237:15  
**sell** 149:15  
**selling** 102:5  
**Senator** 90:2  
**senior** 84:10,21 164:7  
**sense** 138:2  
**sent** 191:11,14 212:8  
**sentiment** 23:18 237:20  
**sentiments** 28:16  
**separately** 179:12  
**September** 17:14 52:14  
**series** 150:3  
**serious** 81:16  
**seriously** 77:11 155:21  
**serve** 7:12 28:6,9 29:21  
39:9 46:17 47:10 72:2  
73:19 98:6 132:3  
**served** 8:11 207:13  
**serves** 127:8 131:10  
164:13 198:6  
**service** 47:8 52:3 53:16  
66:3 91:20 98:4 156:6  
209:5 241:18  
**servicers** 166:11  
**services** 11:15,19 52:6  
54:8 69:18 70:10  
98:11 116:1 143:20  
176:17 177:11 210:3  
210:8,10  
**serving** 28:13 128:15  
133:21 210:22  
**session** 167:14 197:5  
**set** 83:18 134:2 140:21  
181:1  
**sets** 238:8  
**setting** 5:17 68:16  
141:5 176:14  
**settings** 90:3 124:7  
**seven** 25:10 52:22  
**severe** 8:6 110:20  
193:2  
**severely** 38:1  
**severity** 114:7  
**shaded** 233:18  
**Shannon** 125:22 126:1  
126:3,10,18  
**shape** 8:11 84:19 169:5  
**share** 7:18 9:13 18:7  
70:17 75:10 92:8  
111:18 127:3 129:17  
155:14 183:18 213:13  
221:10,13 222:1  
223:1 234:20 240:19  
**shared** 9:16 52:7 152:4  
169:3  
**shareholder** 155:18  
**shareholders** 152:4

**shares** 219:5 220:2  
**sharing** 13:15 104:19  
 106:4,6 148:22  
 168:22  
**sharply** 235:2  
**Sharpsburg** 75:19  
**Shayna** 2:5 3:5 9:17  
 106:9,12 121:18  
 207:6  
**Shaza** 1:16 10:8 145:16  
**shed** 227:13  
**sheet** 16:9 25:6,11 63:5  
 66:2 114:18 123:1  
 197:17 198:2 225:14  
**sheets** 62:21 118:3  
**Shepherd** 78:13  
**Shepherdstown** 6:19  
 74:11,20 78:12  
**shifted** 76:6  
**shifts** 123:1  
**shine** 24:7  
**shined** 24:3  
**ships** 21:12  
**shoes** 104:3  
**shopping** 76:10 110:5  
**short** 87:15 152:4 165:7  
**shortage** 42:18  
**shortages** 83:12  
**shortly** 39:2 125:21  
**shots** 60:10  
**show** 31:11 61:7 116:19  
 117:2  
**showcase** 130:18  
**showed** 114:18  
**showing** 20:14 115:1  
 203:18 215:14  
**shown** 30:5 223:21  
 225:3 237:6  
**shows** 97:21 181:8  
 217:13 218:16,17  
 220:12 224:1 225:12  
 227:22 229:14,16  
 233:14 234:9 235:13  
 238:4,10  
**shrink** 25:6  
**shrinkage** 96:19  
**shut** 67:13  
**shut-ins** 33:16  
**shy** 149:20  
**sicker** 89:1  
**side** 18:20 33:3 46:3  
 74:6 79:20 91:11,12  
 100:21 101:6 115:17  
 119:19 123:13 188:19  
 209:9  
**sight** 43:7 92:21  
**signed** 56:10  
**significant** 8:8,17,18

15:9,21 16:13 47:3  
 68:19 73:7 84:13  
 91:15 99:18 115:7,10  
 120:10,12 155:17  
 167:3 168:9 169:21  
 197:17 203:10 204:4  
 204:15 208:13 227:18  
 231:5  
**significantly** 15:14 37:5  
 67:10 88:4 99:13,21  
 101:10,14 116:4,13  
 118:13 235:1  
**signs** 68:20 115:1  
**silver** 24:1  
**similar** 24:21 25:9 26:2  
 77:17,18 113:5  
 200:14 215:18 238:10  
**similarly** 187:20  
**simple** 214:10  
**simplified** 184:15  
**simply** 125:14 136:10  
**single** 14:12,18 43:21  
 44:16 162:6  
**Sioux** 64:8 65:4  
**sit** 37:3,16 138:13  
 151:11 208:1  
**sitting** 20:3 26:3 64:22  
 207:7  
**situation** 8:6 97:3  
 102:19 103:6 181:18  
 199:4,9 206:19  
**situations** 204:12  
 206:17  
**six** 13:5 62:8 75:6 86:13  
 87:19 215:1  
**sixth** 75:19  
**size** 40:14 75:5 77:16  
 97:5 129:5 135:17  
 161:3 170:7 214:11  
 222:9,10,14 223:16  
 225:22  
**sizeable** 109:3  
**sized** 75:16  
**sizes** 221:4 222:5  
**ski** 22:21,21 23:1 26:7  
**slide** 165:6 169:11  
 170:13 171:10 172:8  
 173:10,11 174:7  
 178:12,13 179:16  
 181:7,8 183:7 184:8,9  
 185:11,20 186:2,20  
 187:9,22 190:7,10  
 192:17 193:14 194:9  
 196:20 214:5 215:8  
 216:17 218:4 219:20  
 221:17 223:5 224:18  
 226:14 228:14 229:13  
 231:12 233:7,10

234:9 235:3 236:10  
 237:22 238:2,4  
**slides** 174:6 175:12  
 181:16 220:8  
**slight** 50:20,21 126:12  
**slightly** 113:20 118:17  
 119:3,6  
**slow** 19:21 33:20  
**slowed** 12:6 50:13  
**slower** 113:17 114:5  
 115:2  
**slowly** 219:13 230:21  
**small** 5:7 13:8 15:18  
 16:1,4 23:21 37:9  
 39:14 65:21 71:15  
 75:15 76:3,14 77:5,10  
 88:6,7 95:6 138:2  
 140:11 141:18 158:3  
 166:20 207:3 209:3  
 220:1,7 221:6,8,16,19  
 221:21 222:1,11,13  
 222:17,20 223:15  
 225:9,13,17,22  
**smaller** 148:11 159:8  
 221:10 225:6 228:2  
**smallest** 217:18  
**smart** 153:14  
**smooth** 103:20  
**smoothed** 50:4  
**snow** 32:19  
**soared** 237:10  
**social** 19:12 48:19  
**soft** 111:14  
**solar** 94:1  
**SolarWinds** 70:20  
 140:17 156:4  
**solicit** 186:10  
**solicits** 186:13  
**solid** 111:14 238:7  
**Solutions** 6:17 51:8,17  
 53:3  
**solve** 35:21  
**solvers** 57:16,19  
**somebody** 36:4  
**someday** 59:4 65:1  
**somewhat** 54:16 81:12  
 120:8 231:3  
**soon** 32:14 192:5  
**sophisticated** 54:1  
**sophistication** 135:17  
**sorry** 4:6 55:3 58:13  
 126:20 171:11 207:19  
 218:17  
**sort** 34:8 35:22 36:7  
 146:3 148:5,9,19  
 207:12 208:21 209:8  
**sorts** 205:19  
**sought** 82:8

**sounded** 56:13  
**soundness** 4:16 27:5  
 64:7 78:2 119:19  
 168:11 198:10  
**source** 128:16 133:10  
 222:18 226:4  
**sourced** 132:20  
**sources** 134:20  
**south** 47:6 58:22 59:13  
 60:4 62:14 64:8 66:9  
 79:20 90:6 95:21  
 157:22 158:4 159:21  
**southeast** 71:14  
**southeastern** 96:2  
**southern** 51:21  
**soybeans** 230:4,19  
 234:19  
**space** 29:13 110:4  
 116:8 122:12  
**spanning** 13:5  
**spate** 45:12  
**speak** 22:4,18 27:19  
 54:15 112:16 139:18  
 146:12,13 153:4  
**speaker** 51:7  
**speaking** 55:3  
**special** 35:20,20 71:2,5  
**specialist** 224:6  
**specialists** 221:14,15  
 223:13,21 224:2,8,13  
**specials** 201:20  
**specific** 172:6 176:15  
 177:2,3  
**specifically** 29:6 40:5  
 116:15 145:7 155:11  
 165:16 203:15  
**specifics** 29:2  
**spectrum** 31:10 219:7  
 222:7  
**speech** 139:1  
**speeches** 150:10  
**speed** 88:18 98:9  
**spend** 106:19 137:20  
 160:13  
**spending** 98:18 142:15  
**spent** 141:17  
**spite** 98:21  
**split** 183:13  
**spoke** 113:14 131:11  
 139:4,5 162:13  
**spoken** 208:3  
**sports** 32:10 131:8  
**spotlight** 130:18,20  
**spread** 32:14  
**spreadsheets** 142:6  
**spring** 23:5  
**springs** 7:5 22:11  
 150:17 161:8

**stability** 11:16  
**stabilized** 50:7 231:2  
**stable** 101:18  
**staff** 9:13 13:13 46:16  
 48:11 54:4 56:11 58:3  
 58:19 60:2,2 74:3,19  
 79:10 81:14 95:19  
 105:20 106:9 125:6  
 171:1 172:17,21  
**staffing** 72:14  
**stand** 17:5 132:22  
 217:2 225:8  
**standard** 5:17 189:16  
 193:4 194:3 195:11  
 195:16 196:1  
**standards** 5:18 135:10  
 141:2,4 144:14  
**standing** 30:14  
**standpoint** 85:2  
**stands** 25:19 154:6  
**Star** 145:17  
**start** 7:18 9:7 10:7  
 62:12 84:7 97:17  
 111:11 138:18 144:8  
 159:16 165:3 191:21  
 192:1 199:16 204:3  
 214:6 220:9  
**started** 6:9 37:20 45:15  
 56:20 66:11 80:5  
 81:21 83:15 87:13  
 103:16 126:19 212:17  
 216:4 240:13  
**starting** 32:9 44:1 82:9  
 85:9 86:5 144:12  
 191:20 203:17  
**starts** 35:2  
**startups** 151:10  
**state** 5:2 6:13 11:5 13:4  
 13:6 14:18 18:9 19:3  
 19:8 20:16,21 21:5,15  
 21:17 32:4 34:20  
 35:14 37:2 44:8 45:16  
 46:2 52:13 54:15 55:6  
 55:8,12,14,19,21 56:2  
 56:4 60:4 62:10 66:20  
 67:9,16 68:2 71:5,19  
 74:21 75:4,18 79:14  
 87:2 94:12 95:6 96:3  
 96:9,11 97:1,18 98:17  
 103:10,15 111:16  
 131:3 161:21,22  
 169:4  
**state's** 45:20  
**state-chartered** 42:7  
 71:18  
**state-owned** 34:6 35:3  
 36:5  
**stated** 165:16

**statement** 135:6  
**statements** 57:2 85:4  
 169:7 203:18  
**Stater** 13:22  
**states** 13:19 35:13 42:3  
 45:18 53:11 67:11  
 79:2 113:8,13 121:21  
 140:2 229:4,7 232:16  
 232:17,22 233:2,4,9  
 233:22 234:20  
**statewide** 75:13 80:15  
**static** 155:4  
**statistics** 31:11  
**status** 102:14 172:22  
**statute** 179:6  
**statutory** 128:17  
 168:13 178:17,22  
 202:5  
**stay** 40:20 44:18 172:7  
**stayed** 101:18  
**stays** 67:21  
**steadily** 11:17 215:15  
**steady** 20:9,10 232:9  
**Steamboat** 7:5 22:11  
 22:21 161:8  
**stemming** 17:19  
**step** 140:7  
**STEPHEN** 1:21  
**stepped** 33:15  
**steps** 132:22  
**Steve** 58:14,20 151:17  
 157:18,22 158:16  
 198:17,17  
**stick** 137:8  
**stimulus** 16:12 26:12  
 32:17 63:16 101:1  
 108:5 130:12 166:22  
**Stone** 7:1 65:19 66:13  
 67:1  
**stop** 217:20  
**store** 102:6  
**storm** 121:16  
**storms** 112:2  
**story** 53:13 152:4,14  
 154:1 222:9  
**story's** 108:14  
**straight** 79:17  
**strain** 88:22 89:4 117:3  
 198:3  
**strains** 88:20  
**Strategic** 131:2  
**strategies** 128:16  
**strategy** 160:19 221:18  
**streamline** 188:3 191:6  
 195:10,16,22  
**streamlined** 165:1  
 182:11 193:5  
**street** 36:14 138:9

149:15  
**strength** 210:11 223:6  
**strengthening** 79:11  
**strengths** 209:22  
 219:22  
**stress** 23:7  
**stressful** 23:18  
**strict** 13:12  
**strong** 11:18,20 15:4  
 16:10,11,22 17:4,12  
 19:1 33:2,2 36:13  
 37:9 46:7 50:19 68:6  
 75:14 92:15,16 93:14  
 102:12 108:2 109:2,7  
 117:9,19,20 118:2  
 207:10,11 223:21  
 230:13 231:11 235:22  
 236:1 239:22 240:2  
**stronger** 12:18 108:6,7  
**strongly** 67:14 98:22  
 156:12 159:21  
**structure** 131:18  
 216:18  
**structured** 182:22  
**struggle** 92:6,11 95:2  
 115:5  
**struggled** 54:18  
**struggles** 37:12  
**struggling** 34:11 51:1  
 68:22 69:5 166:11  
**Stuchlik** 242:11  
**student** 78:16  
**students** 78:14  
**studied** 215:8 218:19  
**study** 3:17 213:15,21  
 214:7,7,9,14,15,16,19  
 215:3,16,19 216:4  
 217:3,4 218:11 219:2  
 221:14 222:1 226:5  
 226:16 227:16  
**study's** 215:1  
**stuff** 159:7  
**subcommittee** 3:7  
 127:5,15 128:4,10,15  
 129:1,7,15 130:17  
 132:6 133:3 135:21  
 136:4 156:17,19  
**subcommittees** 128:8  
**subject** 116:9 165:19  
 173:19  
**subjective** 202:3,7,13  
 202:18  
**subjectivity** 202:19  
**submission** 49:22  
**submit** 172:6 179:19  
 180:10 181:5 182:1  
 188:11  
**submitting** 133:15

**subsequent** 235:6  
**subset** 239:19  
**subsidiaries** 177:7  
**substandard** 206:16  
**substantial** 16:21  
 220:18 229:7 230:3  
**substantially** 238:13  
**suburban** 117:12,13  
**Subway** 115:20  
**succeed** 157:2  
**successes** 74:17 106:7  
**successful** 22:1 45:7  
 54:3,10 55:22 92:2  
 152:21 170:20 211:17  
**sudden** 123:22  
**suffer** 54:14 67:5  
**suffered** 67:10  
**Sugar** 13:2 15:19 17:11  
 18:8 147:22  
**suggest** 227:18  
**suggestion** 125:2  
**suggestions** 104:2  
**suite** 155:19  
**suited** 38:19  
**Sultan** 2:8 3:10 5:11  
 136:19,20,22 137:4  
 147:21 151:15,18  
 159:17 160:21 161:7  
 163:1,9,17,22 226:19  
**summarize** 127:15  
 132:13 139:19  
**summarizes** 173:11  
**summary** 129:17  
 173:17  
**summer** 26:6 81:5,22  
 81:22 82:5 84:6 89:18  
 112:1 113:14 195:7  
**super** 33:1 64:13  
**supervises** 129:8  
**supervision** 2:9,10,11  
 3:11 164:4,19 169:18  
 207:20 209:8 241:5  
**supervisor** 241:6  
**supervisory** 114:19  
 164:2,7,20 165:4  
 167:17 168:10 182:17  
 183:2  
**supplies** 232:9  
**supply** 85:13 231:5  
**support** 4:20 17:5  
 30:15 41:19 49:8  
 57:13 70:14 77:9  
 104:10 105:15 132:3  
 160:17 166:19 226:12  
 231:9  
**supported** 44:15 98:22  
 167:7  
**supporting** 13:15 30:1

38:9  
**supportive** 207:20,21  
**supports** 135:5 222:15  
 222:18  
**suppose** 158:5  
**surged** 66:16  
**surging** 236:17  
**surprise** 68:11  
**surprised** 149:18  
 151:12  
**surprising** 41:4 73:13  
 235:17  
**surprisingly** 68:8 232:2  
**surround** 69:14  
**surrounding** 116:9  
**Survey** 222:12 227:17  
 227:17  
**survive** 148:15 157:7  
**susceptible** 153:12  
**sustainable** 148:15  
**sustained** 225:13  
**swallow** 159:12  
**sweep** 177:11,15 178:2  
 180:8  
**sweeps** 178:1  
**swings** 234:16,17  
**swung** 234:7  
**sync** 87:6  
**syndicate** 131:7  
**system** 6:7,7 8:19  
 26:21 30:22 36:8,11  
 87:12 88:9 103:10  
 104:10 140:18 143:2  
 143:6,10 144:1 147:9  
 152:11 153:6,19  
 154:6 155:12 156:11  
 207:13  
**system's** 155:4  
**systems** 103:13 117:22  
 153:13 155:6 172:18  
 204:9

### T

**table** 157:13 210:1  
**tackling** 31:10 89:14  
**tact** 207:21  
**tail** 239:1  
**taken** 61:18 102:4  
 155:21 194:18 228:17  
**takes** 89:7 163:3  
**tale** 92:5  
**talk** 5:14 8:22 74:3  
 137:1 138:16 156:3  
 157:4 158:19 163:14  
 167:6,19 171:13  
 178:15 182:3 183:8  
 207:2  
**talked** 59:20 62:20

70:21 85:3 105:4,10  
 105:11,16 117:7  
 121:19 136:15 181:15  
**talking** 60:20 106:5,19  
 108:16 126:3 139:3  
 140:16 150:7 155:11  
 159:20 186:2,21  
 187:10 190:11 205:20  
**tandem** 236:21  
**target** 66:15 225:22  
**targeted** 60:22  
**targeting** 61:2  
**tax** 212:4  
**taxes** 20:22  
**team** 27:8 78:5,6,9  
 156:20 164:15 170:4  
 170:12,19 196:22  
**team's** 106:20  
**teams** 70:16  
**teased** 33:9  
**tech** 88:15 150:17  
 160:21 161:10  
**technical** 28:2 141:13  
**technological** 18:2  
**technologies** 5:8,19  
 139:13 156:6 226:21  
 226:21 227:8  
**technology** 11:15 39:11  
 52:5,5 69:16 136:15  
 136:21 137:3 142:2  
 142:10 152:1 153:10  
 154:12,14 158:3,8,21  
 159:1,4,9 160:7  
 161:10 168:17 214:20  
 226:17 227:9,11,15  
 227:19 228:1,5  
**Teleconference** 1:10  
**telework** 170:2  
**tell** 29:3 30:2 37:3 57:15  
 57:21 62:8 146:9  
 158:18 222:8 239:22  
**temporary** 72:12  
 167:12,15 169:8  
**tend** 61:20 218:22  
 219:11 223:15  
**Tennessee** 111:16  
**Teri** 2:3 95:20 104:14  
**term** 33:6 130:9 206:17  
 234:12  
**terminology** 179:14  
**terms** 14:9 25:11 82:12  
 86:2,7 91:16 93:12  
 94:6 100:13 105:8,19  
 126:14 132:21 165:17  
 176:15 203:6 242:7  
**test** 179:22 180:1,2,13  
 180:16  
**testing** 189:5

**tests** 81:15  
**Texas** 46:22 47:6 55:12  
 129:14  
**Texas/Mexico** 47:4  
**thankful** 71:10  
**thankfully** 24:16  
**thanking** 199:16  
**thanks** 9:3 157:16  
 164:17 169:19 209:17  
 213:17 241:14,19  
**theme** 156:3 237:20  
**themes** 105:3 106:3  
 107:2 130:4,10  
 139:17 144:9 214:16  
**thin** 93:21  
**things** 12:19 19:15  
 32:12 35:18,21 42:10  
 46:6 57:10 64:4 67:22  
 68:14 74:3,5 83:5  
 85:7 87:22 89:8,10,11  
 89:16 107:2,3,10  
 110:5 111:2,5 139:2,6  
 139:14 140:16 146:14  
 148:22 149:4 150:8  
 152:18 154:3 155:14  
 160:2 182:3 190:9  
 196:8 199:21 201:14  
 201:21 205:10,19  
 206:6 207:5,8,12  
 212:2,8 230:6  
**thinks** 156:10  
**Thinktech** 161:20 162:4  
**third** 59:5 98:10 108:11  
 141:16 151:1 176:2,5  
 176:19 177:10,14,18  
 177:22 178:3,7  
 181:11,22 182:1  
 223:6 230:19  
**third-party** 141:12  
**thought** 124:20 137:20  
 149:5 199:19 207:8  
**thoughtful** 139:11,13  
 141:9 144:3 149:11  
**thoughts** 145:3 146:3  
 146:10 152:1 162:22  
 209:7,10 210:14  
 240:18  
**thousand** 153:1  
**thousands** 147:1  
**threat** 156:11  
**threats** 70:19 71:1  
**three** 11:4 59:8 94:13  
 98:19 102:2,15,16  
 128:14 129:9 150:10  
 159:2 193:2 218:5  
 219:21 220:8 225:8  
 225:17 233:8  
**threshold** 223:4

**thrive** 5:8  
**throw** 138:21  
**Thursday** 27:6 137:16  
**tied** 92:9,9,13  
**Tier** 16:22 17:8  
**ties** 226:17  
**tight** 67:5 232:9  
**timely** 192:3,14  
**times** 80:21 234:11  
**today** 4:8 5:12 7:9,22  
 8:6,14 9:1,22 10:4  
 22:5 23:14 25:19 37:3  
 42:7 46:16,20 56:1  
 65:17 70:11,21 72:5  
 112:22 128:13 129:11  
 150:8,10,11 163:20  
 164:3,19 167:19  
 188:17 199:4,6  
 213:18 214:3 215:1  
 241:15  
**today's** 7:12,15  
**toes** 89:9  
**told** 152:8  
**Tomorrow** 134:11  
 150:2  
**tons** 45:22,22  
**tool** 56:7 134:12,21  
**toolkit** 155:13  
**tools** 22:1 195:4  
**top** 154:15  
**topic** 53:20 78:21  
 199:17 200:13 205:16  
 208:11,12 219:18,20  
 221:12  
**topics** 6:10 58:5 136:14  
 164:18  
**total** 13:7 16:7,18 19:18  
 23:7 24:18 59:8 76:18  
 77:1,3 87:15 99:3  
 132:7 167:4,5 180:4  
 220:4,5 223:2,10,17  
 235:8  
**totaling** 66:21 67:2  
**totals** 99:7  
**touch** 9:14 144:12  
**tour** 139:4  
**tourism** 21:8 37:13  
 62:14 80:2 92:9  
**tourist** 21:18  
**tourists** 21:17  
**town** 13:8 54:16 66:9  
 71:15 75:21 90:5  
 100:9 138:2  
**townships** 63:15  
**track** 234:17  
**trade** 47:14,19 131:12  
 160:15 169:4  
**traditional** 115:14

**traditionally** 143:1  
**traffic** 21:14 80:10  
 116:4,7  
**trailed** 114:4  
**trails** 113:21  
**train** 116:1 171:5  
 206:22  
**trained** 154:20  
**training** 78:5,6 135:4,5  
 206:3 207:1  
**transaction** 11:7  
 180:13  
**transactional** 180:20  
**transactions** 180:1  
 181:3,20  
**transforming** 151:9  
**transition** 103:20  
**transitioned** 39:3  
**transitioning** 199:7  
**transitions** 197:21  
**transmittal** 194:1  
**transparencies** 148:9  
**transparency** 148:20  
**transparent** 145:1  
 150:5  
**transportation** 47:14  
**travel** 21:12  
**travelers** 21:15  
**treasury** 133:9,13  
 134:18 184:2 201:12  
**Treasury's** 127:18  
 133:5  
**treated** 204:1  
**treatment** 186:4  
**tremendous** 26:11,21  
 42:13 59:3 62:22 64:9  
 140:4 146:20  
**tremendously** 61:13  
**trend** 67:20 71:4 81:21  
 99:21 118:18  
**trends** 9:21 16:12 20:16  
 29:5 37:4 51:2,5  
 67:14 77:16,18 80:17  
 81:7,9 113:22 114:9  
 116:10 204:18,18  
 217:3 225:19  
**tribal** 42:8  
**tribally-owned** 42:2  
**tribe** 44:12  
**Tribes** 44:13  
**trickle** 45:15  
**tried** 36:9 83:2  
**troubled** 166:9 205:4  
**troubles** 207:13  
**true** 28:17 36:9 182:17  
 200:22 210:1 218:13  
 237:11  
**truly** 57:18 88:6 210:9

**Trust** 145:17 242:10  
**Truststar** 10:9 12:12  
**try** 25:4 49:18 70:9 73:3  
 112:16 121:11 124:13  
 124:15 207:4 213:6  
**trying** 48:13 63:2 85:15  
 87:22 144:13 149:15  
 152:11,18 153:6  
 161:1,2 212:12  
**TUESDAY** 1:7  
**tune** 94:21  
**tunnel** 116:4  
**turbulent** 229:1  
**turn** 7:11 41:20 60:15  
 63:2 106:8,21 111:7  
 112:6 125:14,22  
 127:21 129:19 136:10  
 145:12 164:16 169:16  
 188:14 197:2 213:6  
 214:5 216:17 224:19  
 228:15 231:13 235:4  
 240:12,17  
**turnaround** 192:3  
**turned** 62:19 83:17  
**turning** 9:8 62:13  
**turnover** 17:22  
**twice** 33:22  
**Twin** 82:10  
**two** 23:2,6 38:4 51:20  
 51:22 52:1,3,11,19  
 57:7 73:21 76:21  
 78:15 91:3 92:5  
 103:12,13 107:3  
 115:22 119:18 131:17  
 136:22 149:20 150:11  
 150:14 179:16 181:15  
 182:3 185:9 192:21  
 193:7,8 214:9,18  
 216:6,18 217:2  
 218:10 219:19 224:12  
 225:19 229:16 238:13  
 240:6 242:7  
**two-month** 137:17  
 149:20  
**two-thirds** 217:13  
 221:7 234:14  
**type** 35:20 59:16 92:22  
 156:18  
**types** 70:10 83:22  
 129:2 132:18 201:21  
 221:2  
**typical** 53:12  
**typically** 45:17

---

**U**

---

**U.S** 113:20 114:3 115:6  
 127:18 133:5 143:1  
 184:2 223:9,10

228:18 229:15,21  
 230:14 233:20 234:7  
 235:21  
**UDAPs** 193:3  
**ultimately** 39:9 153:11  
 157:1  
**Ulysses** 51:11  
**unaffiliated** 177:13,15  
 178:2,5,10 217:1  
**unanticipated** 17:10  
**unbanked** 42:5  
**uncertainly** 102:18  
**uncertainty** 8:17 69:14  
 107:12 116:9 120:20  
 122:6  
**underbanked** 42:5  
**undercapitalized**  
 173:22  
**undergrad** 78:16  
**underlying** 181:21  
**understand** 31:4 134:6  
 197:15 211:11  
**understanding** 77:13  
 141:13 199:2  
**understood** 161:1  
**underway** 173:7  
**underwriting** 86:8  
 226:22  
**unemployment** 11:16  
 20:16 37:6 45:19 55:6  
 75:10 80:15,20 96:7  
 96:14 109:12,17  
 114:2  
**unfortunately** 24:19  
 96:17 209:4  
**unintended** 26:10  
**unions** 94:14 133:10  
 183:19 200:10 201:3  
**unique** 77:9 130:1  
 135:13  
**unit** 14:12  
**United** 42:2 45:18 140:1  
**universe** 132:17  
**Universities** 49:5  
**University** 78:13  
**unmask** 32:10  
**unnecessary** 36:7  
**unprecedented** 121:16  
**unregulated** 140:18  
**unscripted** 150:4  
**unsecured** 148:4  
**unseen** 43:8 92:21  
**unusual** 78:5  
**unusually** 228:21  
**update** 3:7,9,11,17 9:8  
 19:2 127:12 131:15  
 133:16 173:7 205:14  
 213:14

**updated** 135:3  
**updates** 105:13 127:16  
 129:20 164:2 168:22  
**upper** 229:4 233:5,6,11  
 233:16,21 234:3,7,10  
 234:13,16 235:16  
 237:11 238:5 239:3  
**ups** 98:5  
**uptick** 37:13 50:21  
 60:12 62:15 93:22  
 120:6  
**Upton** 1:15 7:11  
**upward** 81:21  
**urban** 30:7 43:18  
 117:12  
**USDA** 101:12 233:8,13  
 233:18 234:1,8  
 239:20  
**USDA's** 239:13  
**use** 56:8 93:19 112:7  
 160:21 166:18 184:16  
 185:18 195:5 207:1  
 226:17  
**useful** 106:17 137:20  
 158:18  
**uses** 175:13 178:3,8  
 227:16  
**usual** 47:21  
**usually** 96:8  
**Utah** 71:15  
**utilize** 6:2 56:5 57:8  
**utmost** 48:16

---

**V**

---

**vacancies** 11:6  
**vacancy** 122:13  
**vaccinated** 14:6 19:6  
 48:12,14 97:12  
**vaccination** 48:6 76:1  
 81:17 89:5  
**vaccinations** 19:4  
 60:14 115:8  
**vaccine** 14:1 48:9 54:18  
 97:8,14  
**vaccines** 55:3  
**Valley** 7:4 22:14 23:8  
 24:3 161:8  
**valuable** 241:4 242:5  
**values** 20:9 53:9 101:17  
 231:13 232:10,16  
 236:22 237:9,12,15  
**varies** 115:11  
**variety** 75:15 160:16  
**various** 134:22 135:1  
 156:5  
**vendors** 5:19  
**venues** 97:17  
**version** 191:20

**versus** 118:16 183:18  
191:16 200:10 217:4  
**vet** 70:12  
**video** 1:10 70:6 111:12  
111:14,15,19,22  
112:6 121:12,14,15  
121:19 122:2,8,11,12  
122:20,21 123:5,6,9  
123:11,14,16,19  
142:15 165:7 166:5  
179:5 184:2 242:20  
**view** 7:2 27:8 107:2  
139:15 155:4  
**viewed** 226:10  
**Viewer** 56:8  
**viewpoint** 106:21  
**vigilant** 13:11  
**violations** 193:3,7,8  
**Virgin** 113:10  
**Virginia** 6:19 11:4 74:12  
74:22 75:4,7  
**Virtual** 103:16  
**virtually** 19:11 49:7  
56:4 81:1  
**virus** 19:3  
**visit** 80:21  
**visits** 114:21  
**vital** 162:10  
**Vogel** 2:11 3:14 164:8  
165:3 169:19  
**voice** 150:21  
**volume** 14:13 15:7  
73:15 122:15  
**volumes** 15:6  
**voluntary** 216:22  
217:16  
**volunteering** 162:5

---

**W**


---

**waiting** 88:16 197:4  
**waiver** 173:21 187:10  
187:12  
**walk** 129:20 138:7  
214:22  
**walking** 138:6  
**wanted** 78:19 128:3  
139:14,15 144:18  
182:2,3,13 211:2  
241:14  
**wanting** 237:18  
**wants** 143:21 179:20  
**Wapello** 95:22 96:7,10  
**warehouse** 110:4  
**Warick** 6:16  
**warmer** 115:8  
**wars** 92:22  
**Warwick** 90:4,5  
**Washington** 11:2 75:1

116:21 117:6  
**wasn't** 83:20 148:8  
191:11 208:3 237:1  
**watch** 82:3 103:3  
119:12  
**watching** 122:16  
**wave** 87:15,16 88:1,3,5  
89:2  
**way** 24:9 28:5 35:18  
67:21 69:18 72:18  
113:7 120:11 139:10  
139:13 144:2,3 154:9  
173:4 189:3,7 190:1  
190:11,12,14,16  
192:12 194:6 201:15  
204:19,21 208:4  
229:16 241:11  
**ways** 41:18 70:2,15  
73:3 108:19 109:10  
128:21 144:15 147:8  
149:17 189:7 241:8  
**weak** 114:9 231:3  
233:21  
**weakness** 68:20  
**weaknesses** 118:7  
**wear** 158:7  
**wearing** 141:20  
**weather** 33:10 115:8  
**WebEx** 112:22  
**webinar** 133:18 134:5,9  
134:12  
**webinars** 40:3 167:8  
**webpage** 166:2 167:11  
169:13  
**website** 182:8,10 188:9  
188:11 211:10  
**week** 31:22 72:14,14  
81:8 115:18 211:8  
**weekend** 103:17  
**weekends** 23:12 39:8  
**weeks** 19:22 23:6,6  
37:22 54:19 162:14  
166:7 167:21 191:22  
**weigh** 204:3 205:21  
**weighing** 70:3  
**weight** 167:6 184:4  
**weighted** 200:1,8  
**welcome** 4:5 6:11 7:6  
7:10,20 126:11  
135:21 151:19  
**well-** 152:16 153:14  
**Wells** 29:10,16  
**went** 34:18 37:22 38:20  
52:3,15 56:4,14 89:1  
126:7,8 161:14 188:1  
207:9 208:5  
**weren't** 40:1  
**west** 1:20 4:4 6:15,19

7:2 13:5 41:22,22  
46:3,10 51:20 74:11  
75:4,7 90:4,5 109:18  
129:12  
**western** 42:15 45:2  
73:21  
**Wharton** 1:18 7:4 22:9  
22:10 157:18 161:7,7  
162:20  
**wheat** 230:5,17  
**whirlwind** 37:1  
**wide** 220:20  
**widely** 220:15 222:15  
**widespread** 232:16  
**wildfires** 206:6  
**willing** 54:6  
**winter** 32:20 112:2  
**Wisconsin** 6:14 55:2,3  
79:15,17 80:13 84:7  
**Wisconsin's** 51:21  
**wise** 33:3  
**wish** 7:6 184:16 201:19  
242:17  
**wolfing** 147:11  
**women** 140:10  
**wonderful** 22:12 27:9  
58:3 140:12  
**wondering** 209:6  
**woods** 88:11  
**word** 7:20 85:6 105:7  
112:6,12 124:12  
227:21  
**words** 111:2 158:17  
**work** 11:10 12:17 21:21  
38:15,21 40:2 42:13  
42:16 60:2 69:4,10  
70:5 74:19 80:11  
82:10 83:12 87:1 90:7  
103:19 106:18 116:13  
128:21 130:19 132:11  
141:5 144:2,6,11,14  
144:15 147:8,13  
155:8 156:20 165:12  
166:11 168:16 169:21  
170:5,18 173:17  
**worked** 23:11 35:5 39:8  
40:9 61:22 64:18,20  
72:16 77:12 200:18  
208:15 209:14  
**workers** 54:21  
**workforce** 11:14,15  
48:21 96:19 116:11  
**working** 13:14 33:6  
39:8,10 44:7 48:21,22  
52:15 78:14 82:6  
103:21 147:3 148:6  
165:20 182:11 205:16  
211:3

**workouts** 205:15  
**works** 36:11 152:16  
155:6  
**world** 6:8 23:4 73:2  
86:1 87:9 89:15 155:5  
165:11  
**worn** 19:13 97:4  
**worried** 22:20 32:20  
**worse** 206:16 207:8  
**worst** 83:16  
**worth** 39:15 231:17  
**wouldn't** 160:22  
**wounds** 51:13  
**wrapping** 104:15  
**write** 188:22  
**written** 186:7 196:10

---

**X**


---

**X** 160:21

---

**Y**


---

**Yampa** 7:4 22:14 23:8  
24:3 161:8  
**year** 8:3,7 11:20,22  
14:20 15:11,12,14,15  
16:16,17,20 19:17  
21:17 22:16 23:13,16  
24:19 25:1,22 33:19  
37:1,19,21 38:14 40:3  
45:11 46:22 54:10  
55:7,19 62:5,9 68:7  
68:11 69:1,4 72:10  
77:22 83:15 88:17  
90:13,14,15 91:9 93:6  
93:9,15 94:12 95:3  
97:19,20,21 98:21  
102:14 103:8,12  
104:11 107:7,10  
108:1,8,11 111:15  
123:4 132:5 135:8  
141:4 144:7,8,17  
152:5 153:7 172:10  
191:4 203:13,13,18  
205:18 207:7 214:15  
214:17 215:3 216:3  
216:13 217:6 219:10  
219:22 221:20 224:4  
229:22 231:10 235:10  
**year-end** 172:13  
**year-old** 152:16  
**year-olds** 60:13  
**year-to-date** 25:10  
**years** 13:22 14:17  
22:15 28:12 42:4  
44:20 45:13 50:8 54:1  
56:7 69:10 72:9 73:21  
98:19 103:13 148:5  
151:8 152:13 155:3,8

160:11 195:13 221:1  
223:22 224:7 229:12  
237:2,22 239:7  
**yesterday** 127:4 129:18  
131:1 132:10 136:7  
**yesterday's** 127:12  
**yields** 15:17 118:4  
**York** 2:7 10:3 92:19  
113:7,22 114:17  
115:17 116:14,21  
117:3,13 118:22  
120:19  
**youngest** 218:20

**Z**

**zero** 50:10

**0**

**0.13** 216:15  
**0.4** 219:10  
**OIBA** 57:14

**1**

**1-800** 24:8  
**1,000** 40:19 87:18  
193:11  
**1,163** 235:10  
**1,500** 39:13  
**1,600** 67:17  
**1,947** 16:2  
**1.05** 215:17  
**1.2** 25:15 134:2  
**1.44** 215:16  
**1.6** 97:7  
**1.7** 47:1  
**1.9** 90:11  
**1:00** 1:10  
**1:04** 4:2  
**10** 3:4 66:8 110:8,13  
126:4,5 129:7 212:22  
218:1  
**10-minute** 125:20  
**10-year** 229:21  
**100** 52:11 65:22 79:17  
91:18 94:22 98:1,2  
158:5 159:18 180:17  
217:19 228:4 233:15  
**100,000** 91:17  
**102** 229:22  
**106** 3:5  
**108** 71:21  
**11** 99:7  
**111** 3:5  
**112** 3:6  
**117-year-old** 96:5  
**12** 14:19 16:20 25:2,3  
84:15 90:6 131:6  
162:6 167:4 207:22

220:4 229:3 234:20  
**12,500** 24:17  
**120** 52:18 59:7 60:17  
**125** 39:15 59:7  
**128** 3:8 223:16  
**13** 1:8 55:15  
**13.5** 73:10  
**13.59** 20:20  
**13.7** 16:22  
**130** 3:8  
**137** 3:10  
**14** 71:20  
**14-** 152:15  
**14-year-old** 152:10  
**14.8** 15:22  
**15** 42:4 81:18 109:13  
167:5 212:22 220:5  
237:22  
**15.4** 76:19  
**150** 25:3 159:18  
**150,000** 76:21  
**157** 76:21  
**16** 13:22 14:17 19:4  
32:1 76:20 94:11  
97:13 99:3  
**160** 33:19  
**164** 3:12 12:3  
**169** 3:14  
**17** 90:8 118:16  
**17-branch** 47:5  
**171** 3:13  
**18** 20:1 84:15 207:22  
**185** 19:22  
**1869** 75:3  
**188** 3:15  
**1892** 71:17  
**1895** 13:5  
**19** 18:16 60:12 61:7  
**1906** 59:7  
**191** 16:6  
**192-year-old** 90:3  
**1955** 66:4  
**1960** 229:16  
**1967** 28:13  
**1970s** 231:19 232:6,13  
232:15 236:15,16,22  
237:9  
**1972** 229:17  
**1973's** 229:20  
**1975** 229:17  
**1979** 237:1  
**1980s** 231:20  
**1984** 214:15 217:11  
**1987** 230:1  
**1987-2003** 233:15  
**1990** 224:4  
**19th** 13:21

**2**

**2.2** 25:19  
**2.5** 61:8 234:11  
**2.7** 100:19  
**2/1/2021** 68:19  
**20** 14:7 22:14 24:18  
61:8 98:12,12 110:14  
160:11 200:7 232:16  
**20-plus** 152:13  
**20-year** 224:18  
**200** 16:17 31:20 67:18  
**2000** 152:5 224:11  
**2000s** 233:20  
**2003** 230:1 239:4  
**2004** 219:20 228:22  
229:18 232:4  
**2005** 232:21  
**2008** 224:22  
**2009** 66:6,12  
**2010** 216:11  
**2011** 66:12 214:15  
217:11 221:1 234:10  
**2012** 214:8 215:10,17  
216:5,20 217:5,12,14  
223:2  
**2013** 228:22 229:18  
234:10  
**2014** 52:2 225:21 229:1  
230:13 232:7 238:19  
**2015** 66:12 232:22  
**2016** 230:16 234:15  
**2018** 222:11  
**2019** 14:10,21 15:8,11  
15:15 16:17,20  
214:17 215:4,11,17  
216:3,15,20 217:5,12  
217:14 220:1 221:1,5  
221:20 223:3,10  
224:4,12,22 227:17  
229:1 231:2  
**2020** 4:5,18 14:8 15:6  
15:12 16:16 17:14  
18:15 20:18 32:18  
37:13 38:17 41:6  
52:10,14 54:10 57:4  
66:14 83:14 85:4  
98:20 99:2,13,20  
101:10 103:12 104:5  
107:21 108:4,21  
109:1 119:3 167:2  
229:1 231:12 235:10  
239:2,12 240:1  
**2020's** 215:5 231:3  
**2021** 1:8 4:6 16:2,15,19  
18:22 20:2,17 24:22  
25:7 26:18,20 32:21  
37:17 46:7 85:5 99:4  
99:15,21 101:10,22

102:9 108:1 113:19  
172:11,14 239:13  
**2022** 52:21 172:20  
**20th** 143:8,9  
**21** 18:17 54:11 64:6  
**213** 3:19  
**217** 12:4  
**21st** 143:14  
**22** 14:5 216:3 232:17  
**23** 118:15  
**24** 77:3 85:19  
**240** 87:14  
**242** 3:22  
**25** 61:7 72:6 87:15  
110:15 179:21 180:2  
180:4 187:22 235:8  
**25,000** 40:18 59:15  
**250** 56:22 131:20  
223:18  
**256** 16:6  
**25th** 12:15  
**27** 19:5  
**270** 73:9  
**28** 224:6  
**29** 173:11,12  
**295** 33:22 34:1  
**297** 19:18

**3**

**3** 60:22 109:8 133:20  
**3.19** 15:11  
**3.2** 217:10  
**3.3** 80:17  
**3.5** 96:11  
**3.57** 15:10  
**3.8** 45:19 80:15  
**3:09** 125:19  
**3:10** 126:8  
**3:15** 125:21  
**3:20** 126:6,9  
**30** 40:15 72:6 76:22  
151:8 191:21 220:10  
224:6  
**30-day** 85:20  
**30,000** 40:18 59:15  
**300** 99:2  
**300,000** 14:20  
**31** 167:3 199:3 223:9  
**31.7** 15:14  
**31st** 16:2,15  
**32** 19:18  
**320** 71:20  
**325** 76:18  
**335,000** 14:19  
**337.7** 183:13  
**34** 18:16  
**346** 13:7  
**35** 48:9,22 111:1 131:7



**350** 56:20  
**35th** 46:22  
**36** 14:5 221:20  
**37** 97:11  
**375** 23:14  
**379** 16:1  
**38** 223:1  
**380** 11:22  
**385** 19:16  
**39** 19:17 183:6  
**39,000** 16:4  
**396** 55:14

---

**4**

**4** 3:2 56:9 107:22  
**4.2** 75:11  
**4.3** 16:18 217:11  
**4.7** 66:22  
**4.8** 56:21  
**4.9** 75:11  
**40** 25:2,13 100:5  
**400** 66:2 75:6  
**407** 53:1  
**43** 216:4  
**45** 216:15  
**450** 98:18  
**46** 60:13 223:2  
**469** 23:14  
**47** 60:13  
**47,000** 76:19

---

**5**

**5** 80:19 96:11 97:15  
 222:22  
**5.4** 16:7  
**5.7** 11:17  
**5:07** 240:3  
**5:10** 213:7 243:4  
**5:15** 213:8  
**50** 29:12 97:9 115:21  
 158:5 159:17 230:17  
 232:18 233:1  
**500** 59:10 66:14,15 95:8  
**51** 14:3 28:11  
**515** 80:6  
**540** 65:20 66:17  
**55** 224:4  
**550** 90:18 99:6  
**565** 96:5  
**569** 23:15  
**578,000** 16:5

---

**6**

**6** 61:4 109:13 228:3  
**6,000** 151:2  
**6.3** 108:1  
**6.7** 56:21  
**60** 48:10

**65** 115:21  
**650** 80:7

---

**7**

**7** 118:17  
**7(a)** 222:21  
**7.1** 20:17  
**7.7** 55:7  
**70** 67:2 74:22 116:1  
 132:6 228:5  
**71** 70:6  
**75** 48:11 184:1,3,6,6  
 201:11,12 223:17

**77** 230:1

**78** 235:15

---

**8**

**8** 26:18 108:22 183:5  
**8.5** 26:19  
**80** 74:22 200:4  
**800** 59:10 67:1 75:20  
**81** 232:21  
**84,000** 66:21  
**86** 15:7 16:16

---

**9**

**9** 133:8 197:21 199:8  
**90** 53:7 59:11 185:2  
**90,000** 40:17  
**90th** 238:7 239:2  
**95** 59:11 129:7  
**96** 42:3  
**98** 52:2

C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: Advisory Committee  
on Community Banking

Before: FDIC

Date: 04-13-21

Place: teleconference

was duly recorded and accurately transcribed under  
my direction; further, that said transcript is a  
true and accurate record of the proceedings.

  
-----  
Court Reporter

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701