

From: [Rick Holder](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] August 23, 2024 Unsafe and Unsound Banking Practices: Brokered Deposits Restrictions; Comment Request (RIN 3064-AF99)
Date: Wednesday, November 13, 2024 11:38:27 AM

Mr. James P. Sheesley
Assistant Executive Secretary
Attention: Comments—RIN 3064-AF99
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Mr. Sheesley:

I am Rick Holder Chairman and CFO of Cattlemens Bank. We operate in the smallest of communities of Oklahoma and the urban areas of Dallas and Fort Worth. I have been in this job for 42 years and had seen FDIC as cheerleader for small community banks, helping us any way they could. Now they continue to make Rules like this one proposed is to facilitate the closing of small banks. I believe FDIC knows the pressure the banks in rural areas are having maintaining adequate deposits. Our bank has felt the pressure from the “To Big to Fail” that has driven our largest customers to large banks. Our legacy customers that have the majority of the deposits in our banks are dying off and the money leaves with the children who live in more populated areas. This is happening when our farmers and ranchers require larger loans for operating , equipment and land.

The Federal Reserve somehow refused to react to the trillions of dollars flooded into our economy and had to raise rates higher and faster than ever before. Our bank customers took the penalty for early withdrawal on the long term CD's and reinvested at the higher rate. This nullified all our hedging of the fixed rate loan portfolio, our NII cratered. The only hedging we could feel comfortable with going forward is FHLB advances or brokered deposits. FDIC knows this and continues to put policies in place to limit our options to run a profitable bank.

I think it would be a great time for FDIC to come up with ways to help community banks find ways to fund their balance sheet instead trying to dry up all our options. For starters unlimited insurance on our deposits like the big boys get. Your policies infer that we are a risk to you're Insurance fund but we both know we are not. There is only one logical reason why you would want to make more restrictive deposit policies on small banks.

Rick Holder

Chairman/CFO

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