



Sergio S. Ora
President & Chief
Executive Officer

November 21, 2024

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 serve as the President & Chief Executive Officer of Citizens Saving bank and Trust Company, a \$185 million minority depository institution (MDI) and community bank located and operating in Nashville, TN. We are blessed and privileged to have the distinction of being the oldest continuously operating African American owned bank in the country currently celebrating the 120th anniversary of our founding in January 1904. We are also the first MDI chartered in the state of Tennessee.

I am writing to express my serious concerns regarding the FDIC's proposed rule relating to Unsafe and Unsound Banking Practices: Brokered Deposits Restrictions (the "Proposed Rule"). If finalized as drafted, the Proposed Rule will harm MDIs like Citizens, other community banks, and our customers. I respectfully request that the FDIC withdraw this proposal.

As a Black-owned bank and an MDI, we have a long history of serving individuals, small businesses, and local organizations in low-to-moderate income communities who have traditionally been underserved or overlooked by mainstream financial institutions. We wholeheartedly believe that our Bank has as its Mission the responsibility to make a positive impact in the communities we serve. Throughout our existence, we have worked diligently to empower our customers to achieve their financial goals and dreams, and for us to be a trusted partner and resource within our community.

Citizens has continuously been challenged and hampered in its ability to gather deposits to fund the Bank's important lending activities, advancements in technology, marketing initiatives, and to compete against regional and national banks. Historically, we have partnered with and utilized third party relationships to access diverse sources of funding, manage costs, and maximize deposit insurance coverage for our large core depository partners. Banks like Citizens should not be penalized by having these core deposits categorized as "brokered deposits" under the FDIC's proposed rule. The proposed rule will impair our ability to manage liquidity that allows us to fulfill our Mission.

I greatly appreciate your attention and consideration of the concerns expressed above.

Sincerely,

