



Gary E. Zimmerman  
*Managing Partner*

November 19, 2024

James P. Sheesley  
Assistant Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street, N.W.  
Washington, D.C. 20429

**Re: Comment on FDIC Notice of Proposed Rulemaking, Unsafe and Unsound  
Banking Practices: Brokered Deposits Restrictions (RIN 3064-AF-99)**

Dear Mr. Sheesley:

We have read the FDIC's proposed rulemaking amending the brokered deposits rule. We think it creates more problems than it solves, as mentioned in many of the comment letters filed in the rulemaking docket. If the proposed amendments are adopted, we think they should be substantially revised.

Sincerely,



Gary E. Zimmerman