Interim Contact	
Bank:	b4,b8
Date:	9/26/2022 *
Case Manager:	b8
Bank Contact:	President b4,b8 and others*
Last Exam:	12/13/2022 Joint b4,b8
MRBA:	b4,b8
IT Exam:	b4,b8
BSA Issues:	b4,b8

^{* -} Contact conducted during a visit which began on 9/26/2022. Please refer to the visit findings for detailed information.

Changes in Bank Products or Services

- The bank has commenced certain fintech BAAS relationships.
- The bank is also performing third-party ACH sender services for **b4,b8** which has significantly impacted the balance sheet.
- The bank submitted notice of intent to engage in crypto-related services during the visit.

Changes in Management or Key Personnel

No changes in senior management since the exam.

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Changes in Strategic Business Plan or Operations

- The **b4,b8** relationship and services appear to represent a new business strategy.
- Management has staffed up to expand mortgage banking operations.

Significant trends or changes in the local economy or business conditions as detailed in publicly available information, Division of Insurance and Research data, or other means.

• Economy remains good.

Purchase, acquisition, or merger strategies.

No mergers or acquisitions planned.

Changes in technology, including operational systems, or plans for new products/activities that involve new technologies.

Normal upgrades.

Financial performance and trends, particularly unfavorable factors identified during off-site analysis.

b4,b8 b4,b8 : b4,b8

Recent Financial Institution Letters, Regional Director Memorandums, or regulations that may affect the institution's operations.

- See comment above regarding crypto-related activities.
- Management was also made aware that the question of whether or not the deposits associated with the **b4,b8** relationship should be considered brokered was under review. Management contends these deposits should not be considered brokered. This will be addressed outside of the visit framework.

Management's concerns about the bank or FDIC's supervision.

• Management noted concern with perceived FDIC resistance to new strategic pursuits (BAAS, **b4,b8** relationship). It was noted that these items involve new risks, and there is a need to understand the risks and ensure the Board understands the risks.