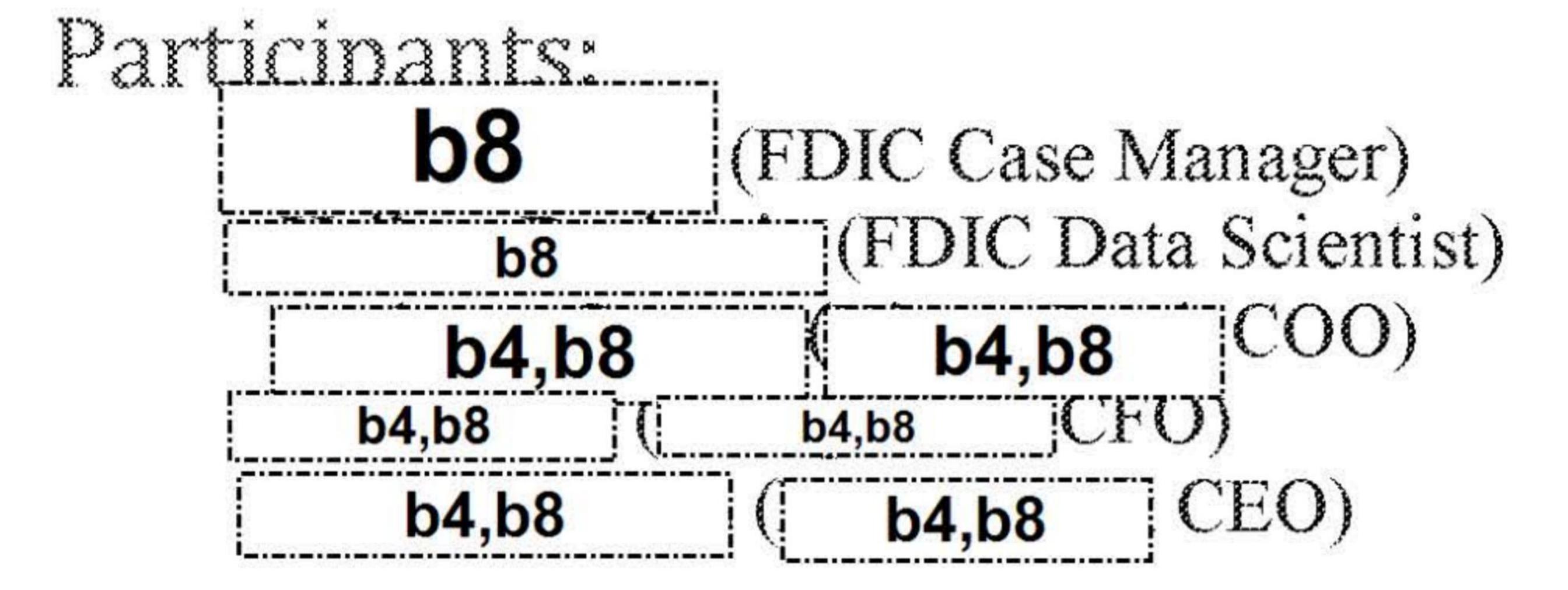
# OFFICE MEMORANDUM

Federal Deposit Insurance Corporation

DATE: 07/24/2024

To:	David Wong Assistant Regional Dire	ctor
From:	b8	
	Case Manager	
Subject:	b4,b8	Discussion
Re:	b4,b8	

Meeting Date: 7/24/2024 2:00 PM Location: Microsoft Teams Meeting



# Motes

Before the FDIC San Francisco Region issue the feedback letter to b4,b8 a meeting was held, as noted above, to verbally discuss the feedback with the Bank. The following items were discussed during the meeting:

## Scope of the Feedback

Feedback is specifically on b4,b8 desire to move forward with Phase II.

#### Findings Based on Review of the Documents Provided:

- 1. Code of ethics: Strictly adhere to bank's Code of Ethics Policy. More specifically, insiders with personal interest in **b4,b8** during Board meetings. The recusal of people with potential conflict of interest during the meetings should also be documented in minutes.
- 2. Management should continue to stay abreast of federal and state securities laws governing transactions involving blockchain technology

3.	Contract: Management should revisit contractual arrangement with b4,b8 and		
			ms and conditions protect the bank's rights / in
	the bank's best interest.		ı
4.	Third Party Oversight: on		b4,b8
	Inconsistencies noted in	b4,b8	Requirements and Systems Development
	documentunclear which e	ntity is respons	sible for providing governance and maintaining
	the system of records.		

### Actions required in the feedback letter:

- 1. Written response within 45 calendar days of the receipt of this letter to address:
  - a. Actions in relation to Supervisory Considerations
  - b. Actions in relation to new risk identification and controls
  - c. Plans and timelines for implementing Phase II
- 2. Re-engage with the FDIC for supervisory feedback before implementation of Phase III.

### Bank Management Response

Management was receptive to the feedback and committed to sending a response within 45 days. After the meeting, the letter was emailed to the bank, and a copy was forwarded to WDFI. WO was informed, and **b7(E)** was updated accordingly.

See next page for the feedback letter