

MEMORANDUM TO: Correspondence File

February 15, 2022

FROM:	b 8			
	Case Manager			
SUBJECT:	Interim Bank C	b4,b8 Contact		
I discussed the bank's condition of the following second s	b8	lso participated	on the call. T	he bank was most
President b4,b8 advised that pandemic. The bank earned ROAA equaled b4,b8 , which performance was b4,b8 in operations, and low cost deposit b4,b8. The budget project month of the year, the bank v	b4,b8 which has been been been been been been been bee	ch was nearly both was nearly che, b8 in 2020. (e, strong income the bank has cos, plus b4,b8 mos,	Contributing to from the bank onservatively b	get. The Sub S the strong earnings k's mortgage udgeted net income of
Asset quality is as clean as carexamination was base, and it records CRE, C&I, followed by 1-4 for bank has some projections for 2022 are in the challenge.	emains b4,b8 amily. Loan yo b4,b8	The lending blume b4,b8 Presiden	focus remains bout about about about about better	the same, which is
There have been no changes Additionally, no major production of the BSA/AML recommendations were subsequently revised and approximation of positive steps, including the conversation involved the necessity in the production of positive steps and approximation of positive steps and approximation of positive steps. Including the conversation involved the necessity of positive steps and approximation and be able to accept the stated that she believed SACM base reiterated the involving these believed the production of the production	ommendations the sous recommendations the bank recommendation of a new test and review the season are season as the season are season are season as the season are season	hat were providentions involving eviewed all the he BSA/AML Foard in early Fellow chief BSA risto justify the volving dang for more than the mowing and underlying danger and underlying danger than the mowing and underlying and unde	collowing this ced during the entered during the entered the bank's bank	conversation, we examination. balligital asset ons and believes most assessment were he noted that the b4,68 lar has taken a number oing through the customers. CFO aired of the bank, but a cash activity

relationships, just to better understand their cash activity. The Customer Due Diligence Rule and Suspicious Activity Rule make up the legal basis for the recommendation. Under a risk focused approach, the bank is required to do more on higher risk accounts. Various options were discussed during the call regarding how to do this, including reviewing CTRs that are being filed by the digital asset customers, or reviewing any underlying concentration reports prepared and maintained by the b4,b8 customers. CFO b4,b8 committed to take further action to better understand the underlying cash transactions and determine if the digital asset customers are appropriately following their policies.

The Leverage ratio equaled **b4,b8** at December 31, 2021. The September 30, 2021, FDIC liquidity worksheet reveals a **b4,b8** Overall Liquidity Assessment and a **b4,b8** liquidity ratio. No information was gleaned from the phone call, or from the UBPR that would necessitate the examination frequency be adjusted. The next examination will be conducted by the **b8**