

August 7, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Response to Customer Comments pertaining to the Proposed Closing of Rockford, Washington Branch.

Dear Ms. Moe:

On August 5, 2019, Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development contacted customer and commenter [REDACTED], by phone, to discuss [REDACTED] concerns, as articulated in the one (1) comment letter remitted to the FDIC dated July 20, 2020 related to the proposed Rockford branch closure.

We are confident that we have resolved the customer/commenter [REDACTED] issues to [REDACTED] satisfaction and consider this matter is remediated to the greatest extent possible under the given circumstances. The proposed branch closing will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter's Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Rockford, WA Branch

Customer/Commenter Issues [REDACTED]:

1. Geographically inconvenient banking services accessibility – The [REDACTED] want to bank in Rockford, WA only and will not utilize available online banking alternative delivery system.

Banner Bank Response:

1. Shane spoke to [REDACTED] and [REDACTED] about the various banking options [REDACTED] could utilize after the Rockford Branch is closed. [REDACTED] discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. [REDACTED] and [REDACTED] appreciated the product offerings; however [REDACTED] do not trust internet technology and were not interested in any option discussed
2. Shane discussed with [REDACTED] that our Rockford Branch, Spokane Sprague and Mullan and Tekoa branch staff along with himself would be available to assist the [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED] for being a Banner client as well as reiterating the bank's desire to continue as [REDACTED] primary bank of choice. [REDACTED] committed to Shane that [REDACTED] will give our Tekoa branch a chance to retain [REDACTED] business.
3. Shane provided his name and direct phone number for [REDACTED] future reference.



4. In addition, Shane's personal telephone call with [REDACTED] covered the following topics:
- Local staff support for [REDACTED] current branch banking needs, as well as help through the transition of [REDACTED] accounts to the Spokane Sprague & Mullan or Tekoa branches.
 - A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using [REDACTED] current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should [REDACTED] retain [REDACTED] accounts with Banner Bank.
 - A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, and ATMs.
 - Name and location of the closest Non-Banner Bank branches in Rockford.

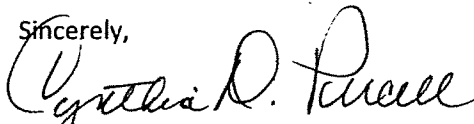
Bank Name	Branch Address	Phone	Distance from Banner Bank
First Interstate Bank	5 West Emma St. Rockford, Wa 99030	(509) 291-5029	113 ft away by waking 1 minute north on 1st st

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the scenarios and circumstances surrounding our decision to close the branch and also communicated [REDACTED] appreciation for receiving a personal phone call to discuss [REDACTED] concerns.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,



Cynthia D Purcell
Executive Vice President, Retail Banking and Administration
Banner Bank
10 S. First Avenue
Walla Walla, WA 99362
Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval - FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- Banner Branch Closure Client Notification Letter

July 20, 2020

Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square
Suite 2300
San Francisco, CA 94105-2780

JUL 28 2020 PM01:05

Dear Sir/Madam:

This is in regard to letters dated June 19, 2020, notifying [REDACTED] that the Banner Bank Rockford Branch located at 2 N. 1st Street, Rockford, Washington would be consolidated into the Spokane Valley Sprague and Mullan branch located at 10 N. Argonne Road.

[REDACTED] are very concerned about this as [REDACTED] options for local banking would be about 35 minutes away at either the Spokane Valley branch or the Tekoa, Washington branch. When [REDACTED] moved to Rockford, Washington, [REDACTED] had a Chase bank account and the closest bank was about 35 minutes away. [REDACTED] checked other local banks and decided Banner Bank provided what [REDACTED] looking for especially since they had a branch in Rockford, therefore, [REDACTED] moved [REDACTED] account to the Banner Bank and since then have enjoyed having a local bank where [REDACTED] get to know the folks in the branch and trust them to do [REDACTED] banking with. Now [REDACTED] being told no, they're moving [REDACTED] do not understand the reasoning behind this. It seems that the Rockford branch is more centrally located for folks in Idaho and Washington. The Rockford branch is on a major thoroughfare where people who are going to the Coeur d'Alene Casino pass by and [REDACTED] have a close bank. [REDACTED] have four different accounts – two checking, one Money Market, and a Certificate of Deposit. While [REDACTED] do online bill pay, when [REDACTED] want get money out of the bank or deposit checks, or get advice on managing [REDACTED] money, [REDACTED] go to the bank where [REDACTED] trust the bank representatives [REDACTED] have been working with to assist [REDACTED]. In [REDACTED] opinion, when a bank is in a bigger city, there is constant turnover so you never get to build a relationship with the people working there. There are a lot of farmers in this community who don't have time to run to town to do their banking. Do they not matter either? [REDACTED] don't go into the Valley very often and when [REDACTED] do, [REDACTED] don't like what [REDACTED] see. There are constant changes and a lot of traffic.

[REDACTED] do not want to scan [REDACTED] deposits into our phone because unlike many other people, [REDACTED] do not trust using those devices for banking. Another reason [REDACTED] changed from Chase to Banner is because Chase didn't care about the local people and they had constant turnover. Here in Rockford, Banner Bank employees care about their customers and [REDACTED] notice that the same folks work there so they get to know [REDACTED] and [REDACTED] get to know them.

[REDACTED] hope this is not going to be ignored and will be taken seriously. [REDACTED] want the Rockford branch to remain open.

Sincerely,

[REDACTED]

cc: Cindy Purcell, Executive Vice President
Retail Banking & Administration

October 9, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Responses to Customer Comments pertaining to the proposed closing of our Lynnwood, Washington branch.

Dear Ms. Moe:

On September 29, 2020, Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development contacted customer [REDACTED], by phone, to discuss [REDACTED] concerns, as articulated in the one (1) comment letter remitted to the FDIC on September 24, 2020 related to the proposed Lynnwood branch closure.

We are confident that we have resolved the customer/commenter concerns to [REDACTED] satisfaction and consider this matter is remediated to the greatest extent possible under the given circumstances. The proposed branch closing will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Lynnwood, WA Branch

Customer/Commenter Issues (Lisa Gibbons):

1. Geographically inconvenient banking services accessibility – [REDACTED] was disappointed in our decision to close our Lynnwood branch. The main reason [REDACTED] was disappointed is [REDACTED] located close to the branch so it is very convenient. [REDACTED] also noted that [REDACTED] really wants to do business with a bank that is physically located in Lynnwood.

Banner Bank Response:

1. Shane spoke to [REDACTED] on September 29, 2020 about the various banking options [REDACTED] could utilize after the Lynnwood Branch is closed. They discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. They also discussed remote deposit capture for [REDACTED] business needs. [REDACTED] appreciated the product offerings and was unaware that [REDACTED] could access any ATM free four times per month.
2. Shane discussed with [REDACTED] that our Edmonds and Mill Creek branch staff, our Client Engagement Center along with himself would be available to assist [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED] for being a Banner client as well as reiterating the bank's desire to continue as [REDACTED] primary bank of choice. [REDACTED] committed to Shane that [REDACTED] will give our Edmonds branch a



chance to retain [REDACTED] and will review the remote deposit capture product for [REDACTED] business needs.

3. Shane provided his name and direct phone number for [REDACTED] future reference.
4. In addition, Shane's personal telephone call with [REDACTED] covered the following topics:
 - a. Local staff support for their current branch banking needs, as well as help through the transition of [REDACTED] accounts to the Edmonds branch.
 - b. A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using [REDACTED] current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should [REDACTED] retain [REDACTED] accounts with Banner Bank.
 - c. A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, bank-by-mail and ATMs.

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the scenarios and circumstances surrounding our decision to close the Lynnwood branch and communicated [REDACTED] appreciation for receiving a personal phone call to discuss [REDACTED] concerns.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,



Cynthia D Purcell

Executive Vice President, Retail Banking and Administration

Banner Bank

10 S. First Avenue

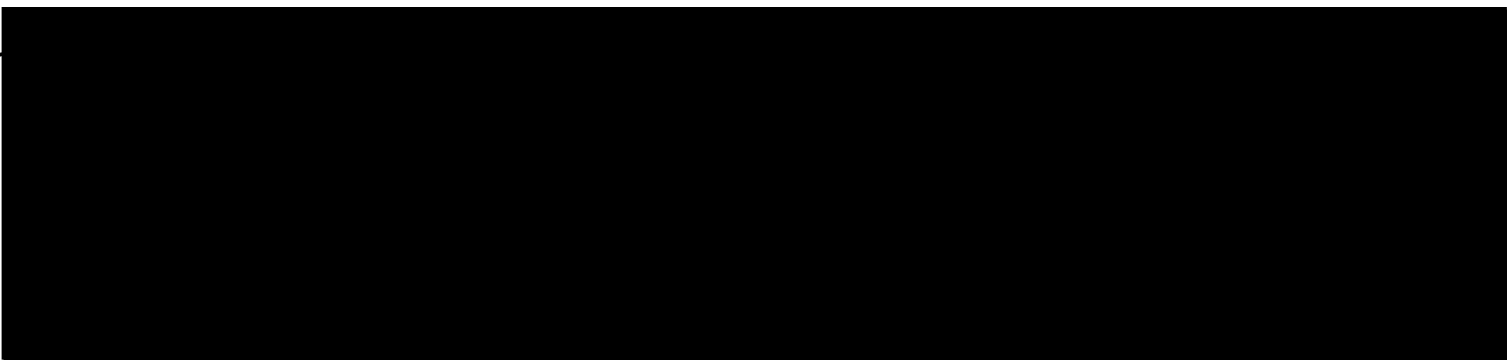
Walla Walla, WA 99362

Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval - FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- Banner Branch Closure Client Notification Letter



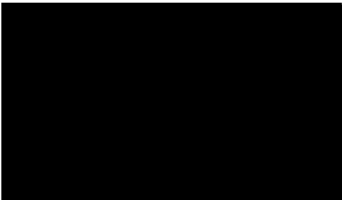
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105

RE: Banner Bank
Lynnwood-Alderwood Branch Closure

September 16, 2020

I was extremely disappointed to hear about this branch permanently closing. I emailed them our concerns and they suggest that I send my comments to you for consideration. I have included a copy of my E-mail to the bank as well as their reply.

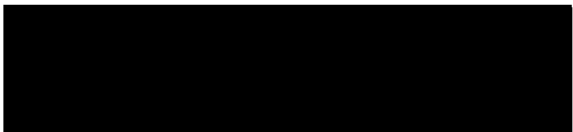
Thank you for your time.
Regards,



SEP 22 2020 AM 07:00

SCANTAB

THIS PAGE IS INSERTED TO SHOW THE END OF
ONE SECTION AND THE START OF A NEW ONE



COPY

Conversations



Banner Bank Security Alert: Secure messag...
Customer Service - Do Not Reply 9/15/2020

RE:Closing of the Lynnwood, WA branch.
Customer Service 9/15/2020

Closing of the Lynnwood, WA branch.
[Redacted] 9/14/2020

Delete multiple

RE:CLOSING OF THE LYNNWOOD, WA
BRANCH.

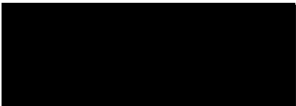
☒ This message should never expire  



9/14/2020 - 1:13 PM

I received the letter today notifying customers that the Lynnwood Alderwood branch would not be reopening and would be permantely closing. I just wanted to tell you this is extremely disappointing as the only reason I switch banks several years ago was because of the fact it was in Lynnwood which is convenient since my business and my home are both located here. It is going to be an inconvenience now, as it currently is, having to go to either Edmonds or Mill Creek to do my transactions in person which is our preferred method. Although we will remain with Banner Bank for the time being, it may be necessary to switch banks to one that does have at least one if not more locations in Lynnwood. I just wanted to give my input in case corporate might be interested.

Regards,



Customer Service
9/15/2020 - 3:16 PM



Good afternoon 

We very sincerely apologize for the inconvenience and thank you greatly for coming forward with your input. I have made sure to both record your feedback and escalate this information over for further review and consideration within Banner Bank.

COPY

We do also recommend sending these comments regarding the Lynnwood - Alderwood branch closure over to our regulators within the Federal Deposit Insurance Corporation at:

25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA, 94105

Please, let us know if you have any additional questions or concerns. Thank you for choosing Banner Bank, and have a great day!

Danni Dietrich
Digital Engagement Team Lead
Monday - Friday
1-800-272-9933 from 7AM - 7 PM PST
For immediate assistance with your accounts, please use our Live Chat feature from 7AM - 6PM PST



October 9, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Responses to Customer Comments pertaining to the proposed closing of our Point Roberts, Washington branch.

Dear Ms. Moe:

On September 29, 2020, Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development contacted customer [REDACTED], by phone, to discuss [REDACTED] concerns, as articulated in the one (1) comment letter remitted to the FDIC on September 21, 2020 related to the proposed Point Roberts branch closure.

We are confident that we have resolved the customer/commenter concerns to [REDACTED] satisfaction and consider this matter is remediated to the greatest extent possible under the given circumstances. The proposed branch closing will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Point Roberts, WA Branch

Customer/Commenter Issues [REDACTED]:

1. Geographically inconvenient banking services accessibility – [REDACTED] could not understand why Banner would close the Point Roberts Branch due to the service being needed and appreciated by the residents in the community. With the current boarder restrictions, travel to the nearest Banner Branch in Blaine, WA is not feasible at this time.

Banner Bank Response:

1. Shane spoke to [REDACTED] on September 29, 2020 about the various banking options [REDACTED] could utilize after the Point Roberts Branch is closed. They discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. [REDACTED] appreciated the product offerings; however [REDACTED] does not trust internet or mobile technology and was not interested in any option discussed.
2. Shane discussed with [REDACTED] that our Blaine, Ferndale and Lynden branch staff along with himself would be available to assist [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED] for being a Banner client as well as reiterating the bank's desire to continue as [REDACTED] primary bank of choice. [REDACTED] committed to Shane that [REDACTED] will give our Blaine branch a chance to retain [REDACTED] business once the boarder reopens.



3. Shane provided his name and direct phone number for [REDACTED] future reference.
4. In addition, Shane's personal telephone call with [REDACTED] covered the following topics:
 - a. Local staff support for their current branch banking needs, as well as help through the transition of her accounts to the Blaine branch.
 - b. A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using [REDACTED] current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should [REDACTED] retain their accounts with Banner Bank.
 - c. A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, bank-by-mail and ATMs.
 - d. Name and location of the closest Non-Banner Bank branches in Point Roberts.

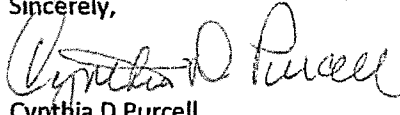
Bank Name	Branch Address	Phone	Distance from Banner Bank
Umpqua Bank	476 Tyee Dr. Point Roberts, Wa 98281	(360)945-6161	0.5 mile drive with a 2 minute drive time

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the scenarios and circumstances surrounding our decision to close the branch and communicated [REDACTED] appreciation for receiving a personal phone call to discuss [REDACTED] concerns.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,



Cynthia D Purcell

Executive Vice President, Retail Banking and Administration

Banner Bank

10 S. First Avenue

Walla Walla, WA 99362

Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval - FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- Banner Branch Closure Client Notification Letter

SEP 21 2020 PM01:01

September 15, 2020

Federal Deposit Insurance Corp.
25 Jessie Street
Esker Square, Suite 2300
San Francisco, California
94105-2780

Dear Sirs:

May I say at the start that I was stunned when I received your letter today announcing the closure of the Point Roberts branch of Banner Bank.

I cannot see the reasoning for such a closure, since the service is needed and appreciated by those of us who are residents in this community. It was indicated in your letter that we may continue using Banner Bank by using services offered in Blaine.

Perhaps you are unaware of our border restrictions in Point Roberts. For the past several months, and perhaps much longer, we are allowed to travel through the province of British Columbia, Canada, in order to go to the border that marks the Blaine community. This, however, is restrictive in that we must be traveling for essential services only, which cover medical and hospital appointments. This Bank closure will be more than inconvenient for most people living in Point Roberts. It will also affect the several Canadian customers who have come to rely on this branch for services, now and when the border does eventually open up again. As they live in close proximity, I doubt that they will want to make the longer trip down to Blaine and will change their bank services from Banner.

Beyond that, and perhaps most importantly, I wish to express my deep disappointment in losing the outreach of the caring and professional staff of the Point Roberts branch of Banner Bank. These women have treated me and the others who use their services, with personal and understanding customer service. They represent Banner Bank in the finest and most professional manner.

I cannot express more clearly my concern over the announced closure of the Point Roberts branch of Banner Bank. We need this branch in our community and ask you to carefully reconsider your decision.



October 9, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Responses to Customer Comments pertaining to the proposed closing of our Riddle, Oregon branch.

Dear Ms. Moe:

On September 29, 2020, October 6, 2020 and October 8, 2020 Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development attempted by phone and email to contact customer [REDACTED] to discuss [REDACTED] concerns, as articulated in the one (1) comment letter remitted to the FDIC on September 24, 2020 related to the proposed Riddle branch closure.

As of October 9, 2020, we have been unsuccessful in making contact with [REDACTED] as [REDACTED] have not provided a return response. We will continue to periodically reach out to [REDACTED] in order to make contact prior to our December 11, 2020 Riddle branch closure date. Upon contact with [REDACTED] I will follow up with a written response outlining both the content and outcome of our discussion.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,

Cynthia D Purcell
Executive Vice President, Retail Banking and Administration
Banner Bank
10 S. First Avenue
Walla Walla, WA 99362
Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval - FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- Banner Branch Closure Client Notification Letter



• 900 E. Fairview Ave. • Meridian, ID 83642 •
208-898-3900 • bannerbank.com
Member FDIC, Equal Housing Lender

October 29, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Response to Customer Comments pertaining to the proposed closing of our Riddle, Oregon branch.

Dear Ms. Moe:

On October 27, 2020, Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development made contact with customers [REDACTED] by phone, to discuss their concerns, as articulated in the one (1) comment letter remitted to the FDIC on September 24, 2020 related to the proposed Riddle branch closure. This is a follow up to the letter to the one I sent to you dated October 9, 2020 outlining our inability to make contact with [REDACTED]. I have attached the letter dated October 9, 2020 for your reference.

We are confident that we have resolved the customer/commenter concerns to [REDACTED] satisfaction and consider this matter is remediated to the greatest extent possible under the given circumstances. The proposed branch closing will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Riddle, OR Branch

Customer/Commenter Issues [REDACTED]:

1. Geographically inconvenient banking services accessibility – [REDACTED] was upset that it will be difficult to maintain banking services with Banner with no physical branch in Riddle. [REDACTED] was concerned about what will happen to our current Riddle branch staff upon the closure. [REDACTED] has lived in Riddle most of [REDACTED] life and does not want to bank with Umpqua Bank, which will be the closest bank to Riddle.

Banner Bank Response:

1. Shane spoke to [REDACTED] on October 27, 2020 about the various banking options [REDACTED] could utilize after the Riddle Branch is closed. They discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. [REDACTED] appreciated the product offerings and was unaware that [REDACTED] could access any ATM free four times per month.
2. Shane discussed with [REDACTED] that our Winston branch staff, our Client Engagement Center along with himself would be available to assist [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED] for being a Banner client as well as reiterating the bank's desire to continue as [REDACTED] primary bank of choice.



900 E. Fairview Ave. • Meridian, ID 83642
Ph: 208-898-3900 • bannerbank.com
Member FDIC, Equal Housing Lender

3. Shane provided his name and direct phone number for future reference.
4. In addition, Shane's personal telephone call with [REDACTED] covered the following topics:
 - a. Local staff support for their current branch banking needs, as well as help through the transition of [REDACTED] accounts to the Winston branch.
 - b. A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using [REDACTED] current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should she retain their accounts with Banner Bank.
 - c. A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, bank-by-mail and ATMs.
 - d. A commitment from Banner, that if the Riddle community could attract interest from another bank or credit union that Banner would be open to selling the existing branch real estate to a competing bank or credit union.
 - e. Name and location of the closest Non-Banner Bank branch to Riddle:

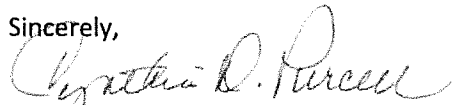
Bank Name	Branch Address	Phone	Distance from Banner Bank
Umpqua Bank	215 S. Main St. Canyonville, OR 97417	(541)839-4271	5.5 miles with a 9 minute drive time

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the scenarios and circumstances surrounding our decision to close the Riddle branch, however, stated [REDACTED] was not sure if [REDACTED] would remain a Banner customer. [REDACTED] did appreciate receiving a personal phone call to discuss [REDACTED] concerns.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,



Cynthia D Purcell

Executive Vice President, Retail Banking and Administration

Banner Bank

Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval - FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- First FDIC Response letter dated October 9, 2020

[REDACTED]

Sent: Tuesday, September 15, 2020 08:43 PM
To: publicinfo@fdic.gov
Subject: [EXTERNAL MESSAGE] FDIC Fw: Banner Bank

To Whom it May Concern,

This is a brief email I sent to Banner Bank today. Please help us keep our bank, even if we have to change institution names.

Most Sincerely,
[REDACTED]

----- Forwarded Message -----

[REDACTED]

To: "Danni.Dietrich@bannerbank.com" <Danni.Dietrich@bannerbank.com>

Cc:

Sent: Tue, Sep 15, 2020 at 3:37 PM

Subject: Banner Bank

Dear Danni Dietrich,

We appreciate you taking the time to read this and pass our desires along.

My family and I have been banking in Riddle, Oregon since 1969. We enjoy the sense of community our small financial institution gives, as well the services and professional, kind workers each business has provided over the years.

Banner Bank is the only financial institution in our hometown. Please reconsider leaving us.

I will write and explain more, but I am currently dealing with a death in our family that is taking time and energy. This bank loss was important enough to me to send something brief right now.

Most Sincerely,
[REDACTED]

October 9, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Responses to Customer Comments pertaining to the proposed closing of our Riddle, Oregon branch.

Dear Ms. Moe:

On September 15, 2020, Danni Dietrich, Digital Engagement Center Team Leader, reached out to customer [REDACTED] by email to discuss [REDACTED] concerns, as articulated in the one (1) comment letter remitted to the FDIC on September 15, 2020 related to the proposed Riddle branch closure. Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development contacted [REDACTED] by phone on September 21, 2020 to follow up on the email communications sent by Danni Dietrich.

We are confident that we have resolved the customer/commenter concerns to [REDACTED] satisfaction and consider this matter is remediated to the greatest extent possible under the given circumstances. The proposed branch closing will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Riddle, OR Branch

Customer/Commenter Issues [REDACTED]:

1. Geographically inconvenient banking services accessibility – [REDACTED] was upset that it will be difficult to maintain banking services with Banner with no physical branch in Riddle. [REDACTED] was concerned about what will happen to our current Riddle branch staff upon the closure. [REDACTED] [REDACTED] has lived in Riddle most of [REDACTED] life and does not want to bank with Umpqua Bank, which will be the closest bank to Riddle.

Banner Bank Response:

1. In following up to Danni Dietrich email to [REDACTED], Shane spoke to [REDACTED] on September 21, 2020 about the various banking options [REDACTED] could utilize after the Riddle Branch is closed. They discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. [REDACTED] appreciated the product offerings and was unaware that [REDACTED] could access any ATM free four times per month.
2. Shane discussed with [REDACTED] that our Winston branch staff, our Client Engagement Center along with himself would be available to assist [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED]



█████ for being a Banner client as well as reiterating the bank's desire to continue as █████ primary bank of choice.

3. Shane provided his name and direct phone number for █████ future reference.
4. In addition, Shane's personal telephone call with █████ covered the following topics:
 - a. Local staff support for their current branch banking needs, as well as help through the transition of █████ accounts to the Winston branch.
 - b. A reminder that █████ account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; █████ can continue using █████ current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should █████ retain █████ accounts with Banner Bank.
 - c. A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, bank-by-mail and ATMs.
 - d. Name and location of the closest Non-Banner Bank branches in Point Roberts.

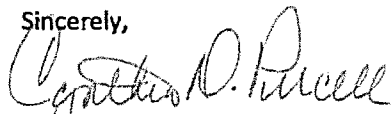
Bank Name	Branch Address	Phone	Distance from Banner Bank
Umpqua Bank	215 S. Main St. Canyonville, OR 97417	(541)839-4271	5.5 miles with a 9 minute drive time

Conclusions and Disposition:

- █████ expressed █████ understanding of the scenarios and circumstances surrounding our decision to close the branch, however stated █████ was not sure if █████ would remain a Banner customer. █████ did appreciate receiving a personal phone call to discuss █████ concerns.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,



Cynthia D Purcell

Executive Vice President, Retail Banking and Administration

Banner Bank

10 S. First Avenue

Walla Walla, WA 99362

Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval – FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- Banner Branch Closure Client Notification Letter

[REDACTED]

Sent: Tuesday, September 15, 2020 06:23 PM

To: publicinfo@fdic.gov

Subject: [EXTERNAL MESSAGE] Riddle Oregon closure of Banner Bank Branch

I am copying and pasting a message I sent to Banner Bank. The local branch in my community is closing. They suggested I email the FDIC as well, to perhaps get the point across better. If there is any way to reverse the closure of my bank, I am on board with attempting it. The message I sent to them follows:

Banner Bank,

I cannot express how disappointed I am that your company has chosen to close the branch in Riddle. You are forcing me to close all three of my accounts, including my business account, all of which I have had in Riddle since 2004, even before Banner bought Sterling. I cannot travel 20 miles each way every time I need to go to the bank. I have lived in Riddle most of my life and have always had a bank available close to home. I would rather not bank with Umpqua Bank, but it is the only viable option I have now which is reasonably close to home.

Your company is willingly alienating many people in a small, close knit community, including several business. Being a mill town, I would imagine that several thousand employees choose to bank in Riddle rather than travel to Winston or elsewhere.

Please reconsider this decision. It is wrong for our community and you are abandoning us.

[REDACTED]

October 9, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Responses to Customer Comments pertaining to the proposed closing of our Oak Harbor, Washington branch.

Dear Ms. Moe:

On September 29, 2020, Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development contacted customer [REDACTED] by phone, to discuss [REDACTED] concerns, as articulated in the one (1) comment letter remitted to the FDIC on September 29, 2020 related to the proposed Oak Harbor branch closure.

We are confident that we have resolved the customer/commenter concerns to [REDACTED] satisfaction and consider this matter is remediated to the greatest extent possible under the given circumstances. The proposed branch closing will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Oak Harbor, WA Branch

Customer/Commenter Issues [REDACTED]

1. Geographically inconvenient banking services accessibility – [REDACTED] was disappointed in our decision to close our Oak Harbor branch. The main reason [REDACTED] was disappointed was that [REDACTED] would no longer have a Banner Bank in Oak Harbor and would now need to drive the 20 miles to visit our Anacortes Branch.

Banner Bank Response:

1. Shane spoke to [REDACTED] on September 29, 2020 about the various banking options [REDACTED] could utilize after the Oak Harbor Branch is closed. They discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. [REDACTED] appreciated the product offerings and was unaware that [REDACTED] could access any ATM free four times per month.
2. Shane discussed with [REDACTED] that our Anacortes, Burlington and Mount Vernon branch staff, our Client Engagement Center along with himself would be available to assist [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED] for being a Banner client as well as reiterating the bank's desire to continue as [REDACTED] primary bank of choice. [REDACTED] committed to Shane that [REDACTED] will give our Anacortes branch a chance to retain [REDACTED] business. [REDACTED] stated that Banner should look to add a Haggen's Grocery In-Store branch since we are closing the stand-alone Oak Harbor Branch.



3. Shane provided his name and direct phone number for [REDACTED] future reference.
4. In addition, Shane's personal telephone call with [REDACTED] covered the following topics:
 - a. Local staff support for their current branch banking needs, as well as help through the transition of [REDACTED] accounts to the Anacortes branch.
 - b. A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using [REDACTED] current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should [REDACTED] retain [REDACTED] accounts with Banner Bank.
 - c. A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, bank-by-mail and ATMs.

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the circumstances surrounding our decision to close the Oak Harbor branch and communicated [REDACTED] appreciation for receiving a personal phone call to discuss [REDACTED] concerns. [REDACTED] was disappointed in our decision to close the location, however understands and will give Banner a chance to retain [REDACTED] business.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,



Cynthia D Purcell

Executive Vice President, Retail Banking and Administration

Banner Bank

10 S. First Avenue

Walla Walla, WA 99362

Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval – FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- Banner Branch Closure Client Notification Letter



To:

Federal Deposit Insurance Corporation

September 18th, 2020

25 Jessie St. @ Ecker Square # 2300

San Francisco, California 94105-2780

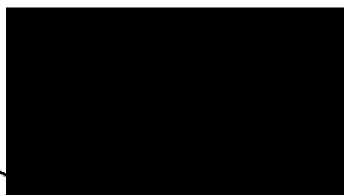
Ref: Closing Oak Harbor Washington Branch of Banner Bank

To Whom It May Concern:

Thank you for taking the time to address my concerns per the closing the Oak Harbor Washington branch of Banner Bank. I am a very satisfied and loyal customer to Banner Bank. The leadership of the bank should reconsider completely taking its services away from our growing community and requiring its customers to travel 30-40 minutes to the City of Anacortes for the banks services.

A potential alternative to removing all services in Oak Harbor is to establishing a satellite branch in one of the larger stores in Oak Harbor's shopping Mall. Several years ago Bank of America had a satellite branch in Haggen's Grocery store and served the community well. At present the footprint of this store would still allow for a small satellite branch.

Please note that I have no affiliation with any business in Oak Harbor. However I do value and respect business organizations who have it in their goal to best serve their customers and the public.



Yours truly,
[Redacted Name]
[Redacted Address]
[Redacted City, State, Zip]
[Redacted Phone Number]

October 9, 2020

Kathy L. Moe, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105-2780



Subject: Banner Bank Responses to Customer Comments pertaining to the proposed closing of our Point Roberts, Washington branch.

Dear Ms. Moe:

On September 29, 2020 and then again on October 7, 2020, Shane Correa, Senior Vice President, Retail Banking Strategy/Market Development contacted customer [REDACTED] by phone, to discuss [REDACTED] concerns, as articulated in the one (1) comment letter remitted to the FDIC on September 29, 2020 related to the proposed Point Roberts branch closure.

We are confident that we have resolved the customer/commenter concerns to [REDACTED] satisfaction and consider this matter is remediated to the greatest extent possible under the given circumstances. The proposed branch closing will proceed as planned and disclosed.

The following represents a synopsis of the Customer/Commenter Issues, Banner Bank Findings and Responses, and Final Conclusions and Disposition:

Point Roberts, WA Branch

Customer/Commenter Issues [REDACTED]:

1. Geographically inconvenient banking services accessibility — [REDACTED] was upset that it will be difficult to maintain banking services with Banner with no physical branch in Point Roberts. [REDACTED] was concerned about what will happen to our current Point Roberts branch staff upon the closure. With the current boarder restrictions, travel to the nearest Banner Branch in Blaine, WA is not feasible at this time.

Banner Bank Response:

1. Shane spoke to [REDACTED] on September 29, 2020 and again on October 7, 2020 about the various banking options [REDACTED] could utilize after the Point Roberts Branch is closed. They discussed bank by mail, internet and mobile banking highlighting our snapshot deposit feature and the availability for cash withdrawals from any financial institution or credit union ATM free of charge. [REDACTED] appreciated the product offerings and was unaware that [REDACTED] could access any ATM free four times per month [REDACTED] stated [REDACTED] is 95% on line and the ATM option will help [REDACTED] in Point Roberts after Banner closes.
2. Shane discussed with [REDACTED] that our Blaine, Ferndale and Lynden branch staff, our Client Engagement Center along with himself would be available to assist [REDACTED] to ensure a smooth transition. Shane thanked [REDACTED] for being a Banner client as well as reiterating the bank's desire to



continue as [REDACTED] primary bank of choice. [REDACTED] committed to Shane that [REDACTED] will give our Blaine branch a chance to retain [REDACTED] business once the boarder reopens.

3. Shane provided his name and direct phone number for [REDACTED] future reference.
4. In addition, Shane's personal telephone call with [REDACTED] covered the following topics:
 - a. Local staff support for their current branch banking needs, as well as help through the transition of [REDACTED] accounts to the Blaine branch.
 - b. A reminder that [REDACTED] account and routing numbers and any electronic debits, deposits and transfers will not change and continue uninterrupted; [REDACTED] can continue using [REDACTED] current checks, ATM and debit cards to access funds and conduct certain transactions at ATMs, should [REDACTED] retain [REDACTED] accounts with Banner Bank.
 - c. A statement of available non-mobile or online banking alternative banking delivery systems including telephone banking, bank-by-mail and ATMs.
 - d. Name and location of the closest Non-Banner Bank branches in Point Roberts.

Bank Name	Branch Address	Phone	Distance from Banner Bank
Umpqua Bank	476 Tyee Dr. Point Roberts, Wa 98281	(360)945-6161	0.5 mile drive with a 2 minute drive time

Conclusions and Disposition:

- [REDACTED] expressed [REDACTED] understanding of the scenarios and circumstances surrounding our decision to close the branch and communicated [REDACTED] appreciation for receiving a personal phone call to discuss [REDACTED] concerns.
- We feel this matter has been satisfactorily resolved to the greatest extent possible given the circumstances.

Please contact me if you have questions or concerns regarding this matter or require additional information.

Sincerely,



Cynthia D Purcell

Executive Vice President, Retail Banking and Administration
Banner Bank
10 S. First Avenue
Walla Walla, WA 99362
Direct ph. (509)526-8897

cc: Kim Albers – FDIC
Ralph Naval - FDIC
Roberta Hollinshead – Washington Department of Financial Institutions
Mark Grescovich – Banner Bank

Enclosures:

- Client Complaint Letter
- Banner Branch Closure Client Notification Letter

Date: 9/12/2020

To:

Banner Bank Federal Deposit Insurance Corporation 25 Jessie St at Ecker Square, St E. 2300
San Francisco, CA94105

From:

 Point Roberts Business and Home Owner

To Whom It May Concern,

I am hoping in my sharing as a business owner and mortgage holder with Banner Bank that you can reconsider closing our local branch, in the near future. I know these are trying times. I also know that I do not know where I/we would be if it were not for your amazing staff here in Point Roberts, WA.

We have been here a little under 2 years and growingly have placed more trust, money and time in the local branch. It will be so much more difficult to keep our dealings with no Banner Bank available here on The Point. We really do not want to take our business elsewhere.

Again, we hope that you can reconsider waiting until after the borders reopen to consider this drastic closure.

In continued community support,

