



Supervisory Condition Letter #2018-07
October 2018

September 10, 2018

Mr. Martin F. Connors, Jr.
President and Chief Executive Officer
Rollstone Bank & Trust
24 Monument Square
Leominster, MA 01453

RE: Request for Authorization to 1) Provide Non-public OCC Information to the Depositors Insurance Fund and 2) Enter into an Excess Deposit Insurance Agreement with the Depositors Insurance Fund and the Commissioner of Banks of the Commonwealth of Massachusetts

Dear Mr. Connors:

The Office of the Comptroller of the Currency (“OCC”) reviewed your letter on behalf of Rollstone Bank & Trust, Fitchburg, Massachusetts (“Bank”) dated October 24, 2017, regarding the Bank’s application to join the Depositors Insurance Fund (“DIF”) as a “Federal Member” to have the Bank’s excess deposits fully insured by the DIF. You have represented that membership in the DIF will benefit the Bank’s depositors in that their deposits in excess of the Federal Deposit Insurance Corporation’s insured deposit limit will be insured by the DIF. You have also advised that the Bank will receive dividends from the DIF. To satisfy a requirement of membership in the DIF, the Bank has requested written OCC authorization to provide the DIF with certain non-public OCC information concerning the Bank. In addition, the Commissioner of Banks of the Commonwealth of Massachusetts (“Commissioner”) made a separate request to the OCC for the Bank’s recent reports of examination (“ROEs”). The Bank has also provided the OCC with a copy of the Excess Deposit Insurance Agreement (“EDIA”) that it intends to enter into with the DIF and the Commissioner.

The OCC reviewed the Bank’s request to share non-public OCC information with the DIF and Commissioner. The OCC has entered into a Confidentiality Agreement with the DIF and Commissioner in which the OCC may provide ROEs directly to the DIF and/or Commissioner following a request made pursuant to the Confidentiality Agreement. Although the Bank may make a request on behalf of the DIF and/or Commissioner to the OCC, the Bank may not provide non-public OCC information, including ROEs, directly to the DIF or Commissioner. The OCC will provide certain ROEs requested for the DIF and the Commissioner to review the Bank’s pending application and will consider additional requests for non-public OCC information upon receipt.

With respect to the EDIA, the OCC reviewed the revised draft EDIA provided to Bank counsel on July 2, 2018 which was unexecuted but in substantially final form. Nothing in the EDIA affects the OCC's visitorial authority. The OCC has no supervisory objection to the Bank entering into, and operating under, the EDIA provided the Bank submits written notification to the OCC prior to entering into the EDIA that the Bank will abide by the following three conditions:

1. The Bank will terminate the EDIA if the OCC requires the Bank to do so.
2. The Bank will immediately notify the OCC if any actions are taken against the Bank by the DIF and/or Commissioner.
3. The Bank will promptly inform the OCC of any legislation enacted by the Massachusetts legislature concerning the DIF and/or the DIF's fund.

The required written notification, and all subsequent notices, shall be forwarded to:

Michael P. Moriarty, Assistant Deputy Comptroller
Office of the Comptroller of the Currency
Boston Field Office
Suite 1400
99 Summer Street
Boston, MA 02110

The conditions of this approval are conditions "imposed in writing by a Federal banking agency in connection with any action on any application, notice, or other request" within the meaning of 12 U.S.C. § 1818. As such, the conditions are enforceable under 12 U.S.C. § 1818.

If you have any questions, please do not hesitate to contact Michael P. Moriarty at (857) 415-3419.

Sincerely,

/s

Kristin A. Kiefer
Deputy Comptroller