

JONAH BANK OF WYOMING, KIM DEVORE

Proposal and Comment Information

Title: Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks; Bank Holding Companies (Reg O and Y), R-1896

Comment ID: FR-2026-0028-01-C40

Submitter Information

Organization Name: Jonah Bank of Wyoming

Organization Type: Company

Name: Kim DeVore

Submitted Date: 10/19/2026

Please find attached comment letter for Proposal ID: R-1896 on behalf of Jonah Bank of Wyoming.



October 19, 2026

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Re: Proposed Rule to Modernize Regulation O

Dear Members of the Board:

Jonah Bank of Wyoming appreciates the opportunity to comment on the Board's proposal to modernize Regulation O. We support the proposal and commend the Board for undertaking a comprehensive review of a regulation that has not been substantively updated in many respects for decades. We believe the proposal appropriately updates longstanding provisions while maintaining the regulation's underlying safeguards related to insider lending.

We particularly support the proposed increases to various dollar thresholds and the introduction of periodic adjustments using an objective economic measure. Several key Regulation O thresholds have remained unchanged for many years, and we support the Board's proposal to update and periodically adjust those thresholds. Periodic adjustments will help maintain the relevance of those thresholds over time and reduce the need for future large-scale revisions.

We also support the Board's efforts to codify longstanding interpretations, align certain definitions and concepts across Federal Reserve regulations, modernize the definition of executive officer, and simplify certain reporting and disclosure requirements. These changes will improve consistency and transparency in the application of Regulation O.

While we support the proposal as drafted, we encourage the Board to consider future modernization efforts involving Regulation W and Sections 23A and 23B of the Federal Reserve Act following completion of this rulemaking. Community banks frequently encounter challenges applying affiliate and related-interest concepts to trusts, estate-planning vehicles, limited liability companies, and other ownership structures. As these structures have become more prevalent and complex, the application of existing affiliate transaction and related-interest frameworks can result in interpretive uncertainty and operational challenges.

We believe a future review of Regulation W could provide an opportunity to simplify and clarify these requirements while maintaining the safety and soundness objectives underlying the affiliate transaction rules. We also believe consideration should be given to greater consistency, where appropriate, among related Federal Reserve regulations to help promote clarity and ease of administration.

3730 EAST SECOND STREET
CASPER, WY 82609
307.266.5662 PHONE
307.266.5663 FAX

777 WEST FIRST STREET
CASPER, WY 82601
307.237.4555 PHONE
307.237.4557 FAX

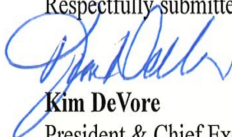
205 STOREY BLVD.
CHEYENNE, WY 82009
307.773.7800 PHONE
307.637.2894 FAX

2015 CENTRAL AVENUE
CHEYENNE, WY 82001
307.773.7850 PHONE
307.638.2554 FAX

As a community bank serving Wyoming businesses and consumers, Jonah Bank values regulations that are effective, understandable, and capable of adapting to changes in the banking industry. We appreciate the Board's willingness to modernize Regulation O and encourage continued efforts to review other longstanding regulatory frameworks that may benefit from similar updates.

Thank you for the opportunity to comment on this important proposal. We support the Board's efforts to modernize Regulation O and appreciate its continued commitment to maintaining effective safeguards while updating regulatory requirements to reflect current banking practices.

Respectfully submitted,



Kim DeVore
President & Chief Executive Officer
Jonah Bank of Wyoming

cc: Bill Rogers, Chief Risk Officer
Tina Sparby, Compliance Officer