



BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, DC 20551

May 9, 2017

Mr. Neal J. Wilson
Chief Operating Officer
EJF Capital LLC
2107 Wilson Boulevard, Suite 410
Arlington, Virginia 22201

Dear Mr. Wilson:

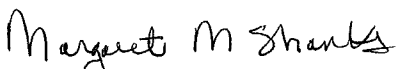
This letter responds to your request on behalf of EJF Capital LLC (together with its affiliates and subsidiaries, "EJF"), Arlington, Virginia, for relief from commitments that EJF made to the Board on December 10, 2012, in connection with its purchase of preferred shares ("CPP Shares") issued by The Baraboo Bancorporation, Inc. ("Baraboo Bancorporation"), Baraboo, Wisconsin, to the U.S. Department of the Treasury as part of the Troubled Asset Relief Program's Capital Purchase Program. EJF provided the Board with passivity commitments that were intended to ensure that EJF would not exercise a controlling influence over Baraboo Bancorporation and that the CPP Shares would not be treated as voting securities under the Bank Holding Company Act. The requested relief would completely relieve EJF from the commitments.

Baraboo Bancorporation redeemed all of the CPP Shares held by EJF on December 29, 2016, and EJF has no remaining equity interest in Baraboo Bancorporation. EJF represents that it does not have representation on the boards of directors of Baraboo Bancorporation or any of its affiliates or the right to appoint a director to the boards of directors of Baraboo Bancorporation or any of its affiliates; existing or contemplated business relationships with Baraboo Bancorporation or any of its affiliates; employee or director interlocks with Baraboo Bancorporation or any of its affiliates; formal or informal agreements with Baraboo Bancorporation or any of its affiliates relating to the management or policies of Baraboo Bancorporation or any of its affiliates; or relationships with other shareholders of Baraboo Bancorporation through which it might exercise influence over Baraboo Bancorporation or any of its affiliates.

EJF also has represented that it will not exercise or attempt to exercise a controlling influence over the management or policies of Baraboo Bancorporation or any of its affiliates.

Based on all the facts of record, the Director of the Division of Supervision and Regulation, acting pursuant to authority delegated by the Board, and after consulting with the General Counsel, has approved EJF's request for relief from the commitments provided in connection with EJF's purchase of the CPP Shares. This action is based on the representations and commitments set forth in all of your communications related to your request, including the representations discussed above. Any change in the facts presented could result in a different conclusion and should be reported to Board staff immediately. This determination should not be construed as granting relief from any other conditions or commitments to which EJF may be subject.

Very truly yours,


Margaret McCloskey Shanks
Deputy Secretary of the Board