



CAMELS CONSULTING GROUP LLC

“INCREASING SHAREHOLDER VALUE”

Guidance For SDIRA Program Operating Benchmarks

Common Stock:

Common stock is typically purchased for the benefit of a SDIRA from two primary sources:

- Purchased directly from the street
- Purchased through an Offering Circular (raising capital)

Common stock would be purchased only in ‘whole shares’ no fractional

Setting of Purchase Price:

The Board of Directors of BHC/Bank need to make determination that common stock purchases (street) would be based on the most recently performed third party stock valuation of the company/bank.

- Company/Bank would notify stock transfer agent on FMV pricing
- Dependent on stock liquidity (availability of stock purchases for the benefit of a SDIRA would be distributed as evenly as possible between account holders.
- Secondary offerings: Common stock purchases would be based on the offering price and subject to the guidance, as detailed within the circular.

Frequency:

- Recommendation for end of quarter purchases for existing SDIRAs based on availability of funds
- New SDIRAs as new accounts or transfers (internal-external) would look to purchase available shares at time of opening.
- Operations to review cash positions quarterly and either make direct purchases or seek guidance from account holder on purchaser’s intent.

Distribution:

- Community bank stock is inherently ill-liquid and depending on institution may have periods of availability of stock versus periods of extremely limited availability.
- For periods of limited availability, it is recommended that shares be evenly spread across all buyers.