



South Carolina
Bankers Association

JULY 13-14, 2026

Understanding CAMELS and Working with the Regulators

BART SMITH, MANAGING DIRECTOR AND PARTNER
PERFORMANCE TRUST CAPITAL PARTNERS, LLC



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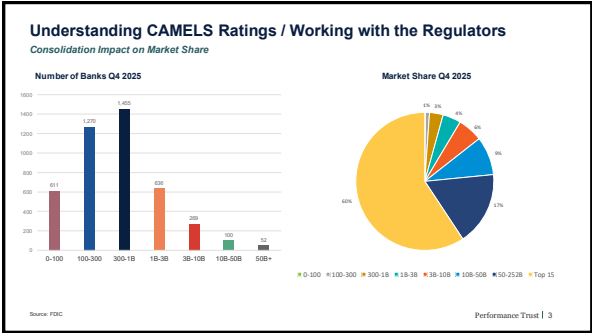
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Understanding CAMELS Ratings / Working with the Regulators

1. Understanding CAMELS Ratings?
2. Working with Regulators?

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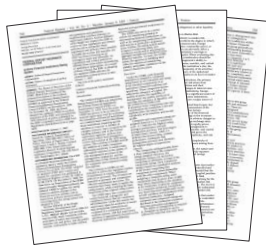
Understanding CAMELS Ratings / Working with the Regulators



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Understanding CAMELS Ratings / Working with the Regulators
Uniform Financial Institutions Rating System



3-Failure appears unlikely given the overall strength and financial capacity of these institutions.

4-Failure is a distinct possibility if the problems and weaknesses are not satisfactorily addressed and resolved.

5-Institutions in this group pose a significant risk to the deposit insurance fund and failure is highly probable.

Source: Federal Reserve

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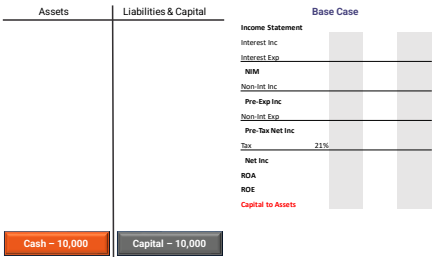
What is a Bank and How does it Fail?

What is a Bank?

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What is a Bank?

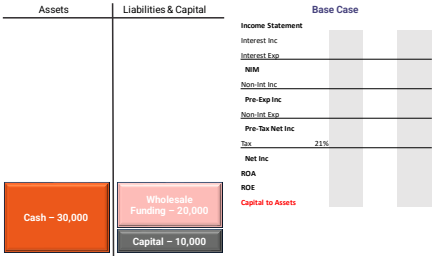


For Bankable income only

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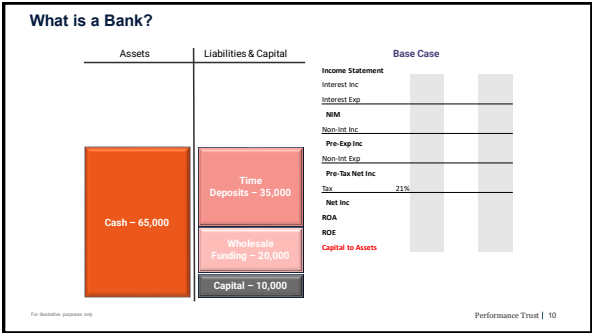
What is a Bank?



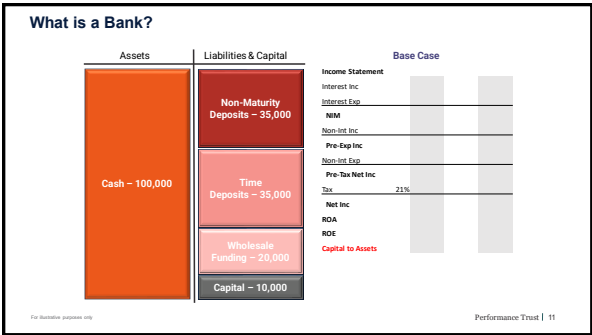
For Bankable income only

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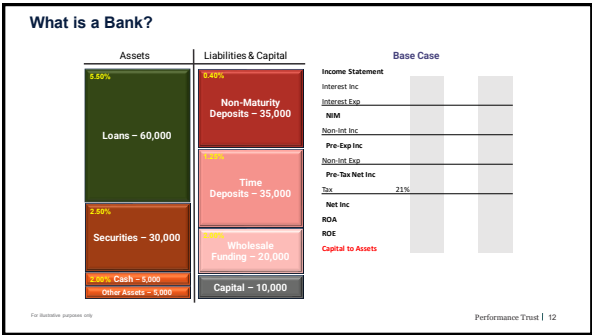
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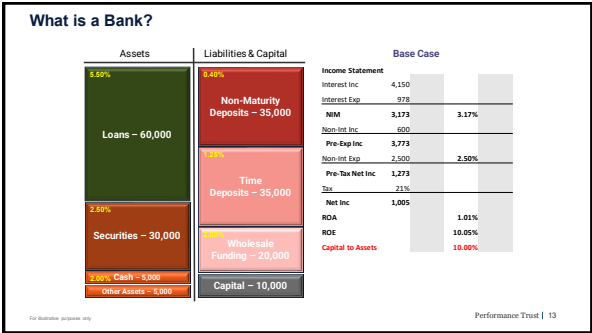
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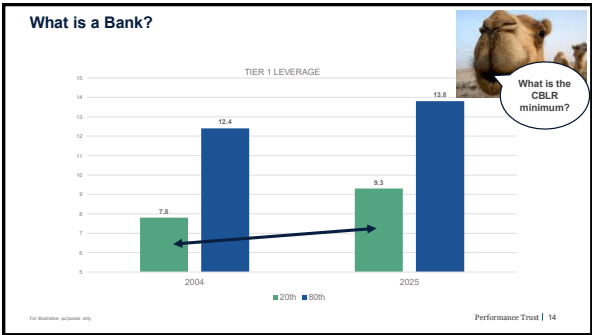
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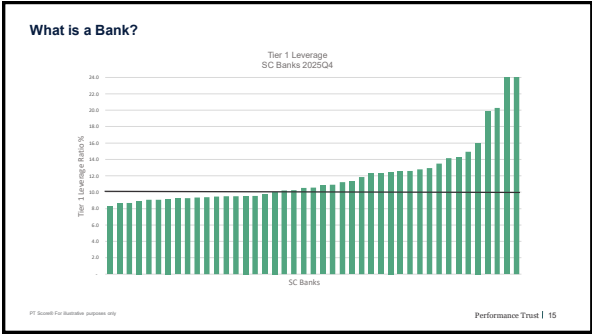
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What is a Bank and How does it Fail?

What is a Bank?

Bill Nygren – Oakmark Capital

<https://open.spotify.com/episode/2vZp13JgzR64icqQOkbkeZ>

Start at 2:45

Pause at 4:39

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What is a Bank and How does it Fail?

How do Banks Fail?



How do Banks Fail?

Credit Events

Interest Rate Events

Liquidity Events

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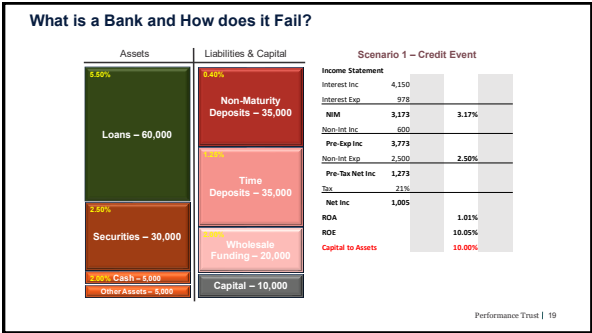
What is a Bank and How does it Fail?

How does a Bank Fail?

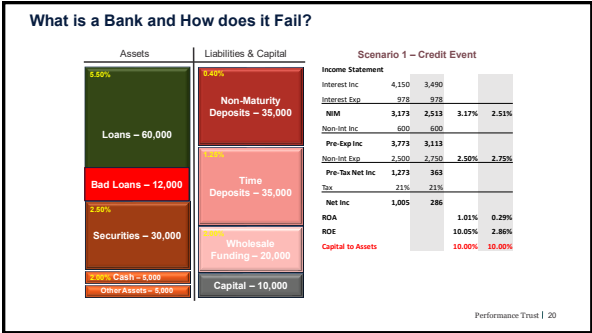
Scenario 1 – Credit Event

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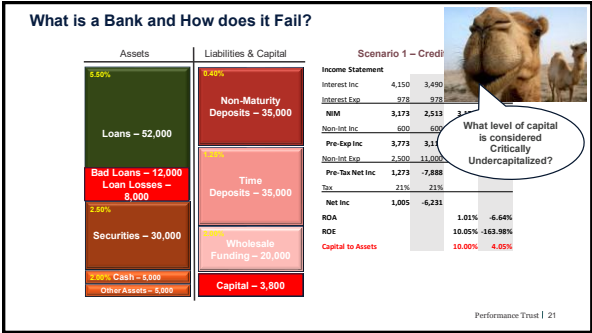
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What is a Bank and How does it Fail?

How does a Bank Fail?

Scenario 2 – Credit Event
Higher Loan to Asset Ratio

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What is a Bank and How does it Fail?

Loan-to-Asset Levels and Bank Size



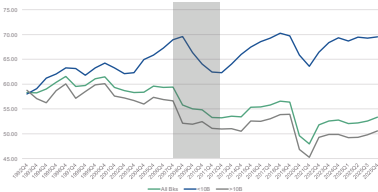
Source: Federal Deposit Insurance Corporation (FDIC)

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What is a Bank and How does it Fail?

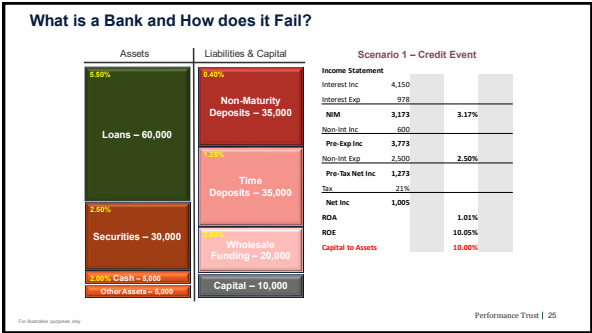
Loan-to-Asset Levels and Bank Size



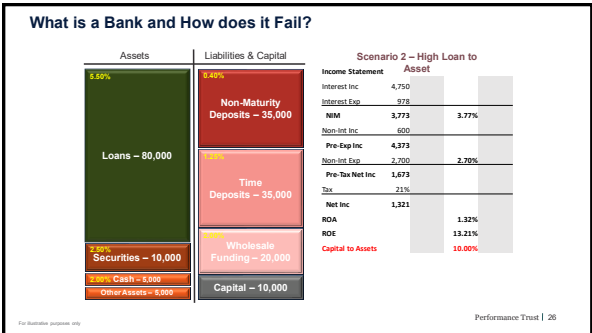
Source: Federal Deposit Insurance Corporation (FDIC)

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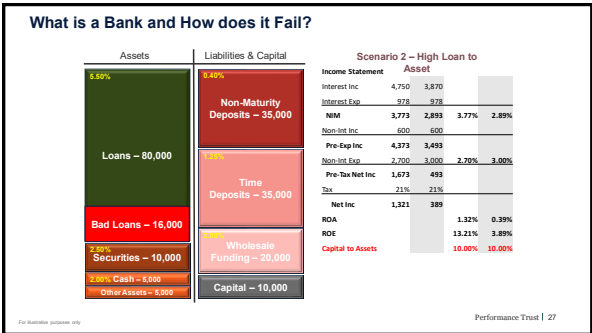
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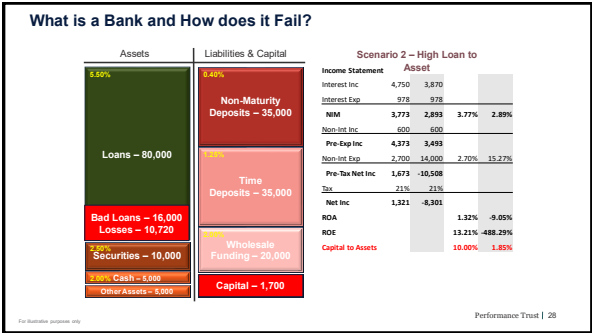
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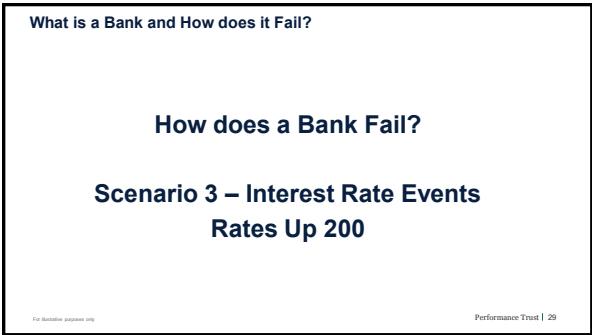
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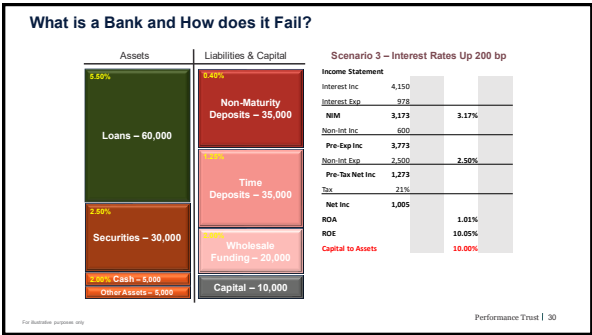
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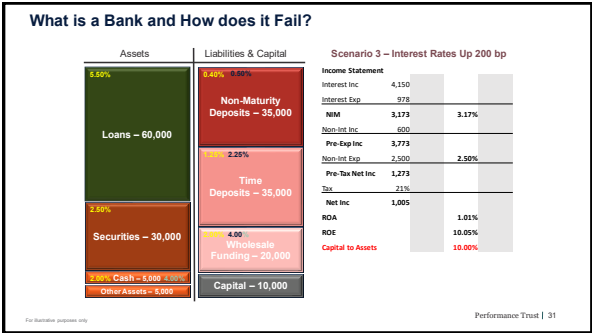
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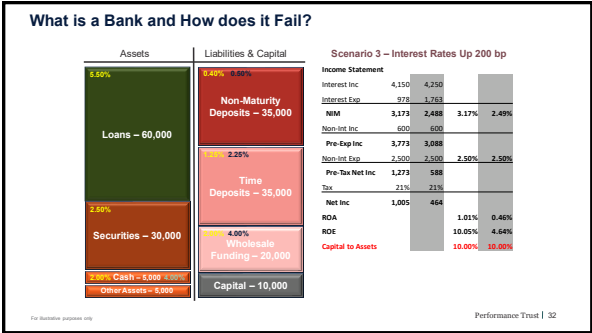
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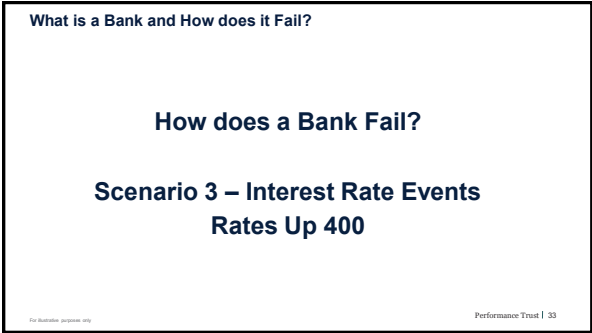
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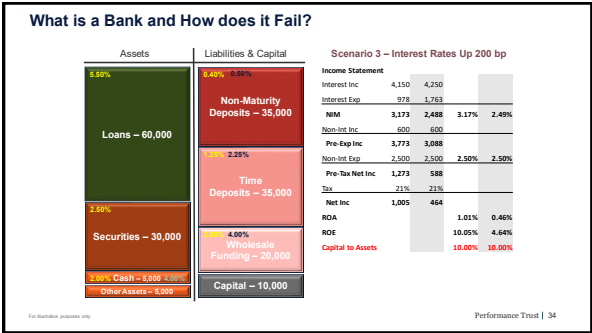
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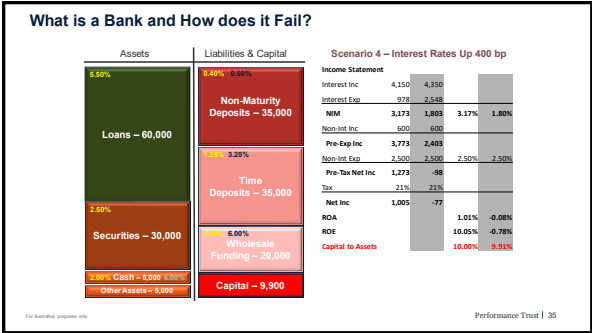
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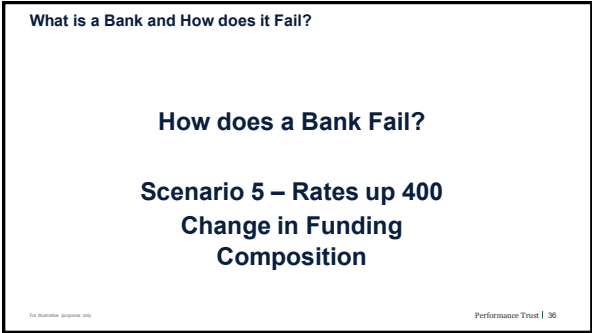
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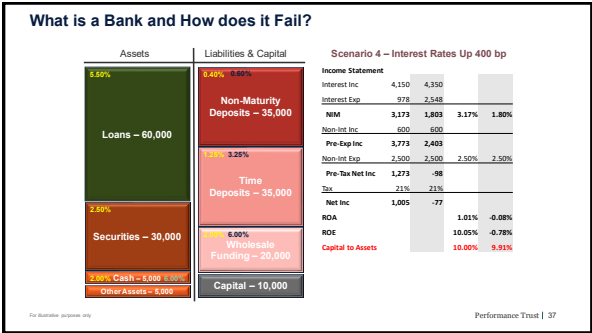
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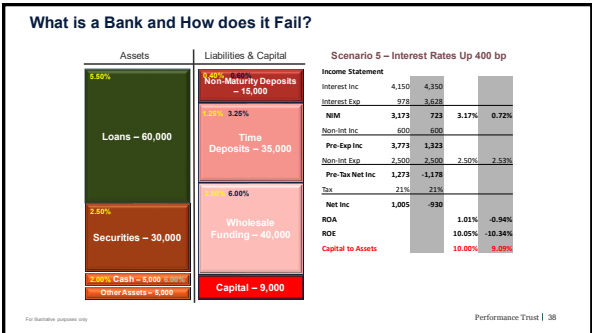
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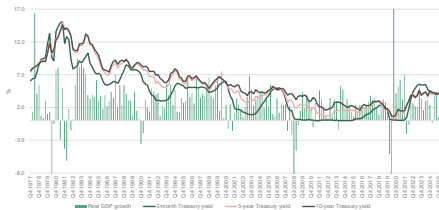
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What is a Bank and How does it Fail?

GDP and Interest Rates



Source: Federal Reserve, Performance Trust Analytics

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What is a Bank and How does it Fail?

How does a Bank Fail?

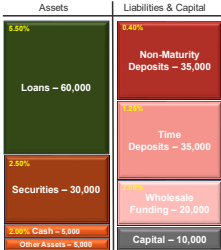
Scenario 6 – Liquidity Event

For illustrative purposes only

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What is a Bank and How does it Fail?



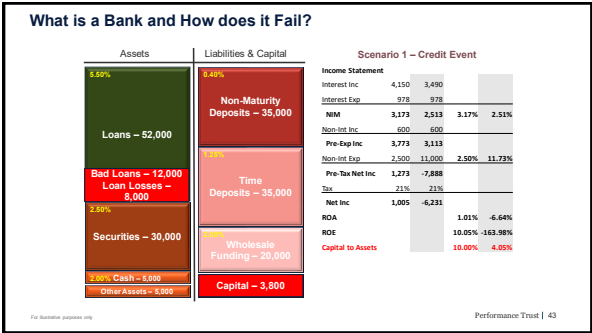
Scenario 1 – Credit Event

Income Statement			
Interest Inc	4,150		
Interest Exp	978		
NIM	3,173		3.17%
Non-Int Inc	600		
Pre-Exp Inc	3,773		
Non-Int Exp	2,500		2.50%
Pre-Tax Net Inc	1,273		
Tax	71%		
Net Inc	1,005		
ROA			1.61%
ROE			10.05%
Capital to Assets			10.00%

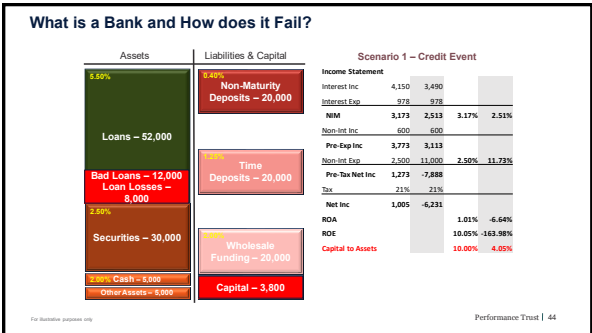
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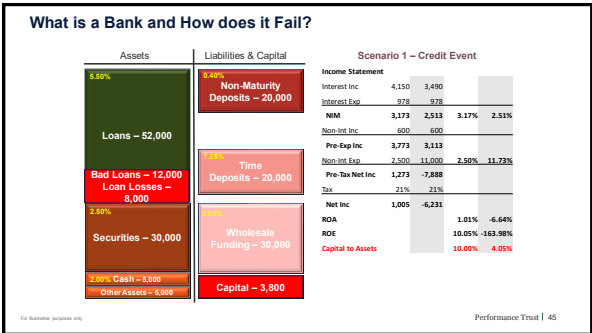
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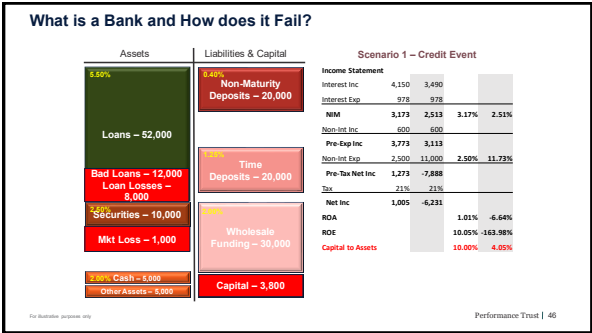
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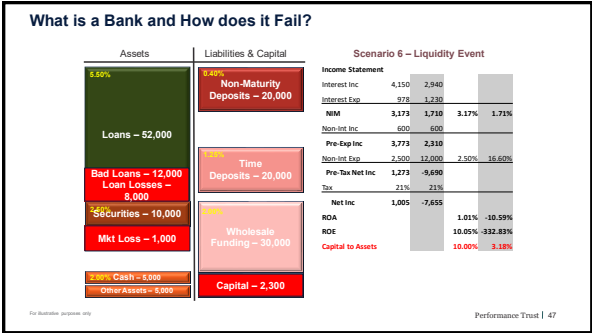
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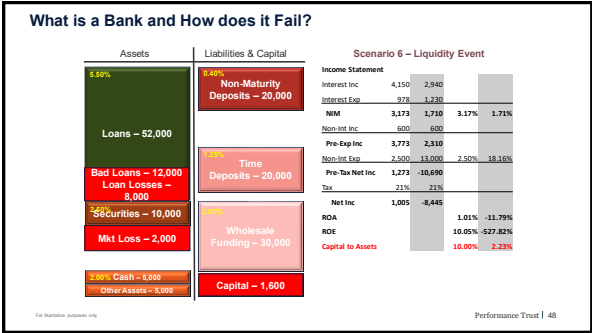
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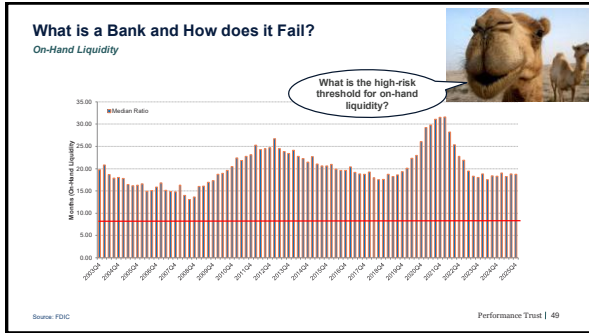
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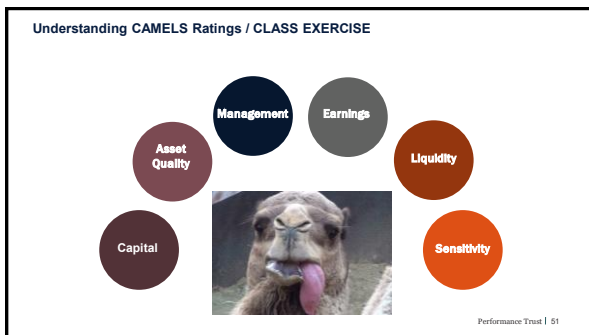
Understanding CAMELS Ratings

What do the examiners do if you start

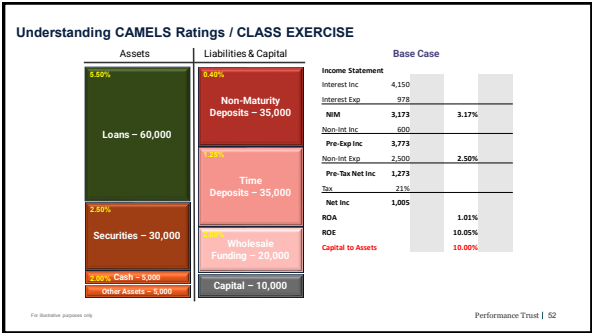
- Board Resolution
- Informal Enforcement Action (MOU)
- Formal Enforcement Action (C&D)
- Removal of Insurance
- Charter Revoked
- Civil Money Penalties
- Removal Actions

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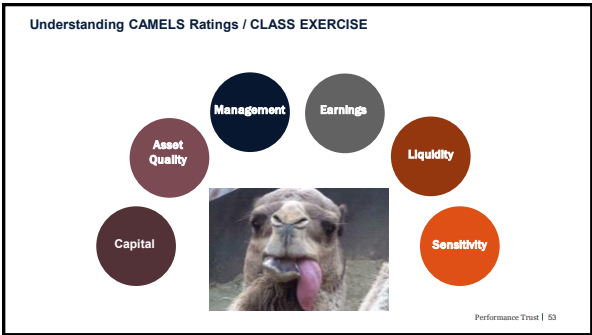
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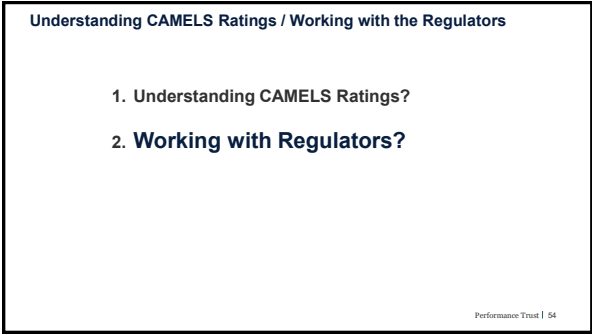
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Working with the Regulators

Managing the Intersection of Risk, Regulation, & Reward

Managed Constraint

- Regulatory Bias
- Imputed vs. Unaware
- Disproportionate Cost

Legal Constraint

- Legislative
- Political Bias
- Disproportionate Impact

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Working with the Regulators

Managing the Intersection of Risk, Regulation, & Reward

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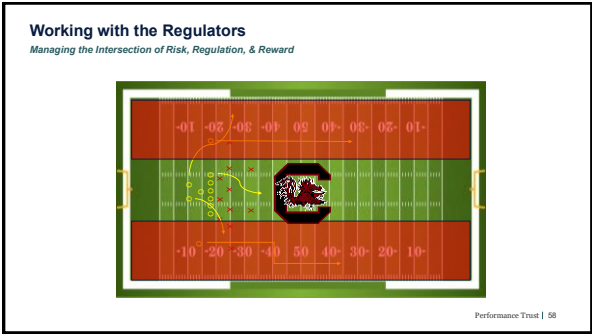
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Working with the Regulators

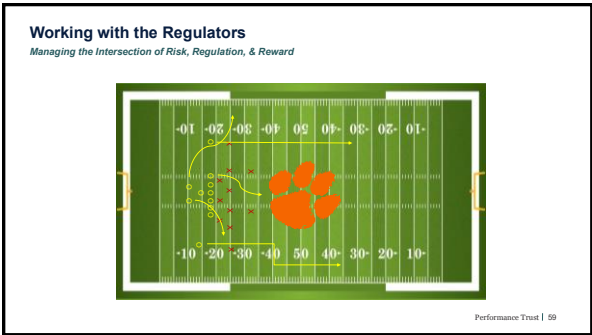
Managing the Intersection of Risk, Regulation, & Reward

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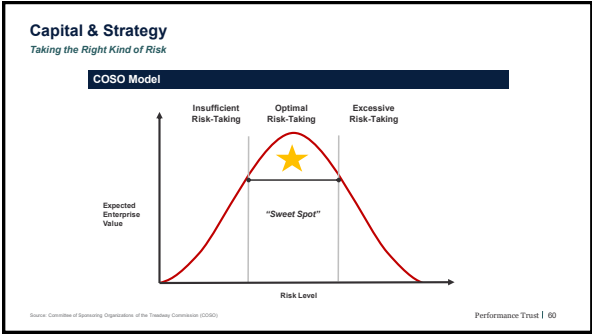
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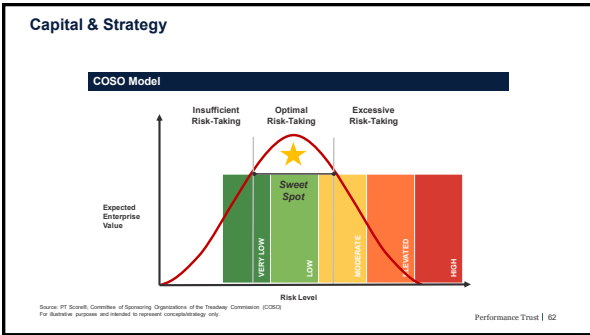
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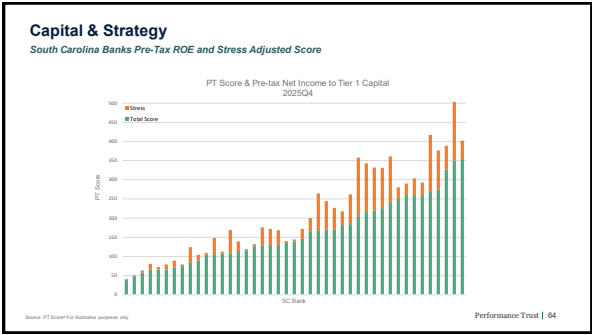
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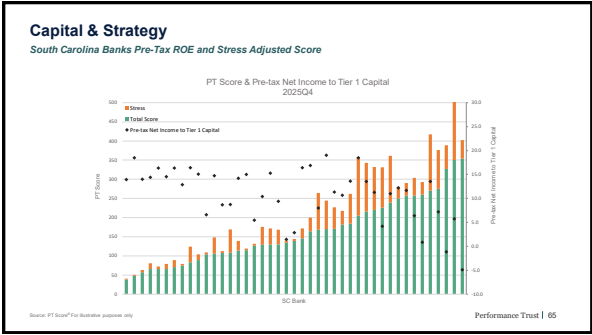
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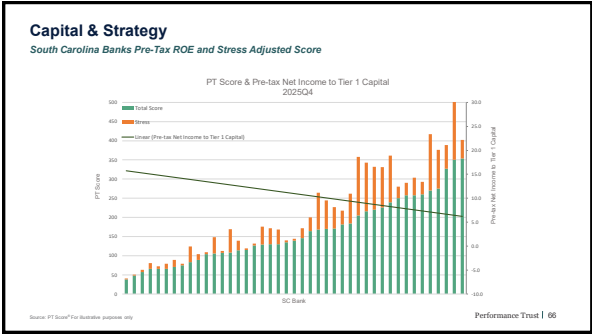
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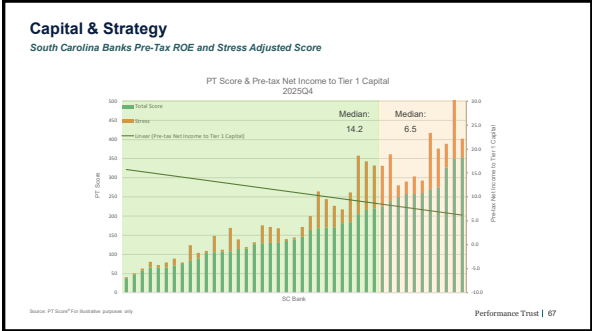
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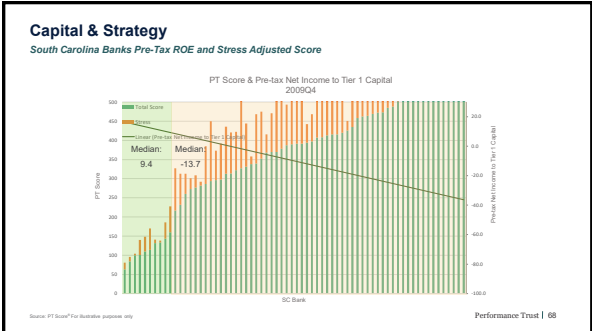
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Drawing on his 25 years of experience with the Federal Deposit Insurance Corporation (FDIC), Bart serves as an expert resource in bank policy and regulatory matters.

Prior to joining Performance Trust, Bart began his career in 1985 as an Assistant Examiner in the FDIC's Houston, Texas Field Office. He received his Commission as an Examiner in 1989 and was promoted to Senior Examiner in 1991. During his tenure in Texas, Bart was instrumental in the examination and resolution of several large banks and savings and loans. In 1992, Bart accepted a Review Examiner position in the New York Regional Office, where he worked primarily with large multinational institutions. In 1997, he was promoted to the Field Supervisor position in the Baltimore, MD where he had coverage of all field examination activities in Maryland and the District of Columbia. In 2002, Bart became the Territory Supervisor for the FDIC's Charlotte, NC office, which covers all supervisory activities in North and South Carolina, including several of the nation's largest banks. Bart held this position in Charlotte until joining Performance Trust in 2012.

Bart holds an MBA from Wake Forest University in Winston-Salem, NC and a bachelor's degree from the Citadel in Charleston, SC. He is also a graduate of The Stonier Graduate School of Banking.



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Managing Director
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