



First Community Bank

982

September 9, 2004

FDIC RECEIVED
2004 SEP 21 P 4:00
THE OFFICE OF
EXECUTIVE SECRETARY

Mr. Robert E. Feldman
Executive Secretary
Attn: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: RIN number 3064-AC50

Dear Mr. Feldman:

I am pleased that the FDIC is giving consideration to certain areas of modification to CRA regulations and CRA evaluations. In particular, it is good common sense to judge small communities on the demographics pertinent to that community.

Our bank, First Community Bank, has total assets slightly over \$100,000,000 and is associated with a holding company. We are located in rural America, southeast Iowa, and have a small branch in west central Illinois.

Our last CRA exam was conducted under the stature or threshold of the consolidated numbers of the holding company. As you can guess, this created quite a stir during the examining process. To compound the issue, the Illinois branch, with less than \$15,000,000 in deposits and four full-time employees, was set apart from the main bank and held accountable for its own CRA standards under the large bank criteria.

Our bank and its employees are very active within our communities. We participate in the opportunities that are available within these communities. However, to meet an area of investment in multi-unit low housing units for the Illinois branch, it was suggested that our bank invest in projects in Illinois that are several hours from this location. Hopefully, this is one of the areas that will be considered in the CRA re-evaluation.

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618 Main St.
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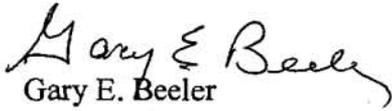
I have included a copy of a recent e-mail that confirms our involvement with in the housing sector. However, please note that any fruit derived from this project will be funded through a new HUD project or funding through an existing grant aided entity. In other words, this community may have a positive result and yet our bank could be denied a direct investment opportunity to meet current CRA criteria.

At this time my intent is have you understand how important it is to judge each institution on the merit of its involvement within its community, not on a standardized table that may or may not apply to the evaluation.

If you would like to discuss these issues in greater depth, please feel free to call me at 217/357-2198.

Thanking you in advance for the opportunity to comment;

Yours truly,


Gary E. Beeler
Vice President

Enc;

 You forwarded this message on 9/7/2004 9:58 AM.

Beeler, Gary E.

From: Brenda Gorrell Pyatt [ccdc@carthage-il.com] **Sent:** Tue 9/7/2004 9:43 AM
To: Tom Hartzell; Teresa Beeler; Randy Sharpe; Judy Klein; Jerry Bartell; Beeler, Gary E.; Ada Bair; Abbie Ray
Cc:
Subject: FW: HUD Review of Data
Attachments:

Friends,

I hope that you are able to participate in this meeting.

Brenda

-----Original Message-----

From: Kathleen Brown [mailto:brownlk@uiuc.edu]
Sent: Tuesday, September 07, 2004 8:52 AM
To: dpflaste@uiuc.edu; Baker - Jerry; Brenda Gorrell Pyatt; Teresa Beeler; Judy Klein; Todd Shackelford; hancock_cty@yahoo.com
Subject: HUD Review of Data

We received positive feedback on the review of demographic data for Hancock County. According to comments from Jim Hamilton, HUD identified a need for 160 affordable housing units in Hancock County. ***This is great news!***

Our next step will be to begin the *discussion of appropriate roles* for each of the various partners. I believe that I have spoken with most of you on the phone, if not please join us for this important next step on **September 15 beginning at 1:30 p.m.** We will be meeting in the **Hancock County Health Department Office** on 671 Wabash Avenue, Carthage (Ph: 217-357-2171).

Thanks for your continued support,

Kathleen Brown, Extension Educator
 Community and Economic Development
 Macomb Extension Center
 480 Deer Rd.
 Macomb, IL 61455

PH: 309.836.2084
 FAX: 309.836.2916
 email: brownlk@uiuc.edu

Visit the Community Development Toolbox at www.communitydevelopment.uiuc.edu

 You forwarded this message on 9/7/2004 9:14 AM.

Beeler, Gary E.

From: Kathleen Brown [brownlk@uiuc.edu] **Sent:** Tue 9/7/2004 9:02 AM
To: Abbie Ray; Ada Bair; Brenda Gorrell Pyatt; Beeler, Gary E.; Jerry Bartell; Judy Klein; Randy Sharpe; Teresa Beeler; Tom Hartzell; Ken Brown; Joe Clark; Ramona Collins; Dave Cornelius; Gehart Jung; Joyce Steiner
Cc: dpflaste@uiuc.edu; Baker - Jerry
Subject: HUD Consultant Review
Attachments:

Good Morning,

Thanks to everyone for your support during the recent consultant visit to Hancock County. We had a most enjoyable day visiting each of the communities and their potential housing sites.

In a subsequent meeting with HUD Officials, the consultant has confirmed the need for additional affordable housing units in Hancock County. This is great news! We will be holding a meeting in the next week to discuss roles for each of the key agencies who have been involved with these discussions to date. Included in this discussion, will be Hancock County Housing Authority, Western Central Illinois Area Agency on Aging, Hancock County Health Department, Memorial Hospital, Carthage Development, RSVP, and University of Illinois Extension.

Following this discussion, we will be holding a meeting for the entire committee to discuss steps in preparing the grant application during the coming year.

Thanks for your continued support, please let us know if you have additional questions.

Kathleen Brown, Extension Educator
Community and Economic Development
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