
From: Chuck Daily [mailto:daily@cfbank1.com]
Sent: Thursday, April 02, 2009 5:12 PM
To: Comments
Subject: FDIC Special assessment

To whom it may concern:

The cost of replenishing the FDIC insurance fund needs to pay for by the large (non -- community type) banks. As a small community bank it is unfair that we be burden because of the mismanagement of large banks.

Our bank's FDIC insurance premium in 2009 is already approximately double 2008 without any additional assessments. Obviously, either a 10 basis point or 20 basis point special assessment will lower earnings substantially during a time where we are trying to build our capital because of the poor economic conditions. Any special assessment will decrease our capital and therefore decrease the amount of loans that our bank will be able to book because of having to prudently manage our risk-based capital ratio.

My understanding is the FDIC insurance fund needs to be replenished primarily because of failures of non -- community banks. Community banks overall have been responsible in managing their bank and have avoided the serious problems of the larger banks. It is unfair to burden the community banks because of mismanagement of the large banks. In addition to the high cost of additional FDIC insurance caused by the big banks failures, the large banks are also causing us to pay much higher deposit rates because of their problems. So our earnings are getting hit double.

Thank you for your consideration.

Charles Daily
President



Community First Bank

4600 N. Illinois St
P. O. Box 1983
Fairview Heights, IL 62208
Visit us at www.cfbank1.com

Tele: (618) 234-9500
Direct (618) 234-9030 Ext. 108
Fax: 618-234-9585
daily@cfbank1.com

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