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**From:** Bill Hogan [mailto:bhogan@fmsbwm.com]

**Sent:** Friday, March 27, 2009 2:40 PM

**To:** Comments

**Cc:** Bill Campbell

**Subject:** Assessments, RIN 3064-AD35

- Community banks like Farmers & Merchants State Bank did not cause the economic crisis, should not pay any special assessment. Our capital is in excess of 12% and we acted reasonably with mortgage lending and investment decisions.
- The FDIC should ask Congress for the authority to levy special assessments on the TBTF banks that caused the financial meltdown.
- The FDIC should tap its line-of-credit with the Treasury.
- If all banks are assessed, then the FDIC should assess premiums based on total assets (minus tangible capital) rather than domestic deposits, which would rightfully place greater responsibility on the TBTF banks.

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