From: Leroy Crull [mailto:lcrull@WayneBnk.com]

Sent: Monday, March 02, 2009 12:33 PM

To: Comments

Subject: special assessment

I would like to comment on the 20BP special assessment to be added to our September 2009 premium cost. As a small community bank, with \$130million in assets, well capitalized and in no need of TARP or other government funds, we consider it unfair to be called upon to pay such an unreasonable price. We did not participate in sub-prime lending, nor did we take unnecessary investment risks for the sake of speculative profits. In short, this will be a severe and inequitable hardship on community banks who did not cause the problems the financial industry is facing.

In addition, an increased assessment rate coupled with the uncertainty of an open-ended authority to charge 10BP special assessments will bring reinvestment of community banking profits to a halt! It is difficult in the best of times for community banks to stay up-to-date with technology, and to fund the capital improvements and growth that create new jobs in the community. It will be impossible under these uncertain circumstances. The reduction in earnings will also without doubt impact our ability to lend money in our community at a competitive interest rate.

The Saving and Loan crisis in the mid-1980's cost community banks dearly. I hope they are not forced to shoulder the burden again.

Thank you, Leroy ("Roy") E. Crull Senior Vice President and Controller Wayne Bank and Trust Co. Phone 765-478-3561 Fax 765-478-3550 Icrull@waynebnk.com www.waynebankonline.com