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March 12, 2009

Mr. Robert E. Feldman, Executive Secretary  
Attention: Comments, Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

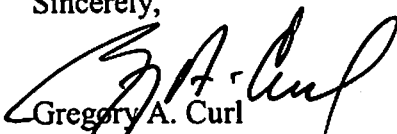
Subject: **RIN 3064-AD35**, Comment Letter on FDIC's Proposed Emergency Special Assessment

Dear Mr. Feldman:

I am strongly opposed to the announced emergency special assessment for the following reasons:

- I believe it unfair to ask well managed and capitalized banks such as ours to pay for the mistakes of others.
- This special assessment will significantly lower the Bank's earnings for the year and reduce shareholder return and capital retention thus lowering the Bank's lending capacity.
- Our Bank elected not to participate in the TARP program as we have over time sufficiently managed our balance sheet while continuing to meet the loan demands of our market.
- Over time, our Bank has taken steps necessary to control expenses to ensure a sustainable level of capital necessary to manage inherit risk and shareholder return. This assessment would dilute those efforts and reduce year end earnings by approximately 20%.
- FDIC should consider a special assessment levied on those banks participating in the TARP program or consider tapping into the Treasury's \$30 billion line of credit available to the FDIC for extraordinary situations or other alternative sources.

Sincerely,

  
Gregory A. Curl  
President and CEO