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**From:** David Black [mailto:[dblack@fwblaw.net](mailto:dblack@fwblaw.net)]  
**Sent:** Wednesday, March 04, 2009 3:04 PM  
**To:** Comments  
**Cc:** [info@icba.org](mailto:info@icba.org)  
**Subject:** Assessments, RIN 3064-AD35

Dear Sirs:

I am writing to express my disagreement with the proposed 20 cent special assessment. It is my view that this is onerous and unduly burdensome on small community banks.

I am a founder and director of Community Bank of Broward, located in Broward County Florida. We are a small but successful bank, having 8 branches. The monetary effect of this special assessment will be approximately 3 quarters of a million dollars, which will be a significant financial hardship if imposed upon us. Although we are currently profitable, this will remove a sizeable portion of our profits, or if things get any worse, could take away all our profits for this year or even push us into the red.

Candidly, I was shocked when I heard the amount of the assessment. My initial reaction was to ask why bother operating, when your efforts and profits or potential loss exposure is subject to this arbitrary and capricious charge. I fully understand the financial predicament our country is facing, and assume you have a need for additional funds. It would seem the federal government should provide assistance, or if you need to charge us more money---at the very least, it should be an equitable amount! It is truly unfair to penalize those of us who are following all the rules, operating successfully, and force us to pay for others problems. Even if you determine we should contribute, understand that what you are doing will significantly weaken us financially as we continue to deal with this difficult time. Without getting into our numbers, I can tell you definitively that the charge you propose is outlandish and completely unreasonable. Please, don't kill the good banks!

I would ask you to reconsider and would hope you do not implement this unfair special assessment.

Thank you for your consideration.

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