
From: Robert Baronner [mailto:rbaronner@mybct.com]

Sent: Friday, March 06, 2009 1:30 PM

To: Comments

Cc: info@icba.org

Subject: FDIC Assesment

I'm President of Bank of Charles Town in Charles Town West Virginia. We are a \$300MM bank on the outskirts of the Washington DC area. Our Market has been hard hit by the real estate crisis.

Although we did not participate in the subprime debacle, many of our larger competitors Wells Fargo, Bank of America, National City, and US Bank did and are responsible for nearly 1300 foreclosures in our immediate area in 2008. This has driven down the price of residential real estate in our area by 30-40% and it has detrimentally affected many hard working people. I did not understand back in 2003-2006 why we were not doing much mortgage lending, but it is readily apparent now. We had ethics and good credit discipline whereas our larger competitors did not.

The special assessment being proposed to keep our fund solvent in effect punishes the "whole class" for the indiscretions of a few. If this assessment goes through, we will have no other choice but to probably raise fees and or cut overhead to compensate for this expense. By cutting overhead I mean cutting personnel at a time when the job market is already tight. Please reconsider your approach to meeting this important funding need. Thank you.

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