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March 20, 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 of FDIC's Proposed Emergency Special Assessment

Dear Senator Durbin,

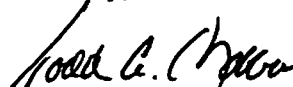
As a Director of Crossroads Bank in Effingham, IL I am strongly opposed to the announced emergency special assessment for the following reasons:

- We 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 manage inherit risk and shareholder return. This assessment would dilute those efforts and reduce year end earnings by approximately 20%.
- We believe 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. At the very least, the assessment should be spread out over multiple years to allow banks to budget and plan around the cost.

At our most recent board meeting it was obvious that this special assessment is also going to have a negative ripple down effect that needs to be considered. Proposals were being discussed to cut back on donations to local charities, reduce employee costs and bonuses, cut dividends to shareholders and a variety of other measures that will offset this assessment. This assessment is not only affecting the banks asked to pay for it, but also the communities these banks are in.

I ask that you reconsider the special assessment as there are better ways to assure the solvency of the FDIC.

Sincerely,



Todd A. Kabbes