
From: Dan Allen [mailto:dallen@firstfarmbank.com]
Sent: Thursday, March 05, 2009 12:36 PM
To: Comments
Cc: First Farmbank Directors
Subject: 20 Basis Point Special Assessment

To Whom It May Concern:

The proposed special assessment is an unfair penalty for community banks that have made an effort to try to do things right. Due to the indiscretions of our larger competitors we are already either formally or informally required to maintain higher capital levels and greater reserve balances. Now you want to add to that pressure by requiring that we reimburse you for your lack of oversight and the stupidity of our competition. It can best be described as piling on.

The smaller community banks are the ones best positioned to take care of and serve their communities during this downturn in the economy. That is....if you do not drag us down with all of the rest of our competition by ever increasing capital levels, reserve balances and FDIC assessments. There is a huge mess in the credit unions, GSE's (Including the forgotten and never mentioned Farm Credit System) and large banks. If we are left in a position that we cannot take care of the communities then who will???

I would suggest that your "special assessment" be limited to the three rated or lower banks that created the problem.

Sincerely,

Dan Allen, President
First FarmBank
Greeley, CO