
From: Keith Tucker [mailto:keith@cfblv.com]
Sent: Thursday, March 05, 2009 6:14 PM
To: Comments
Subject: Assessments, RIN 3064-AD35

Thank you for the opportunity to provide you feedback on the 20-basis-point special emergency assessment.

A few realities from my standpoint. Putting pen to paper, this will cost my bank about \$200,000. My projected net income for the year was \$1,100,000 with the anticipated raise in regular FDIC assessments but without the 'special' assessment, I am now looking at \$900,000 in net income. As a community bank, this is not a small material difference. My Board will not be pleased. Now as my previous plan called for me to consider adding loan staff in order to meet President Obama's call for banks to make more loans, this assessment will effectively gut that plan as I now curtail hirings and marketing. I fail to see how putting more money into the pot for failed banks can make me more productive in lending (which is the real goal of the recovery, right?!?).

This sound suspiciously like an insurance company who raises the rates for all after a hurricane wipes out a bunch of homes built 30 feet from the ocean. The insurance company should have been able to predict that these homes were in danger before the hurricane came - if they had been paying attention to what the homeowner, or in this case the failed banks, were doing to place themselves squarely in harms way!

Respectfully,

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