

**From:** Ken Villebro [mailto:kvillebro@woodlandsbank.net]

**Sent:** Wednesday, March 04, 2009 8:47 AM

**To:** Comments

**Cc:** info@icba.org

**Subject:** Assessments, RIN 3064-AD35

I am writing to express my disappointment and frustration with the announcement of the "special emergency assessment" recently announced. This proposal is an affront to community banks across the country. We have operated this institution responsibly and safely. We did not participate in the unsound practices that lead to this problem and we did not participate in the egregious profits that were realized by those who did. So just when I believed I could look our shareholders, employees and customer in the eye and say, "this is why we have stuck to traditional bank services". I discover that we will have to foot the bill for those who acted irresponsibly. So what will prevent rogue bankers for taking these ridiculous risks in the future? Yes, those who were involved have probably lost their jobs but they still have the money and now they are on to new schemes, i.e. "Penny Mac".

Please take into account what this assessment will mean to community banks. Here at Woodlands, we have been working on a low cost purchase money mortgage program that we planned to roll out on April 1. This is a program that we expected to lose money on or at best break even. This did not involve any TARP or CPP monies. This was just our institution trying to make a small difference within the communities we serve. That program will now likely be shelved. I am certain that similar stories could be told by community banks everywhere. I respectfully request that you reconsider this proposal. There must be a way to solve this problem without placing such a heavy burden on safe and sound community banks.

Ken Villebro  
Chief Operating Officer  
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