## LAW OFFICES ROETHE POPE ROETHE LLP

JEFFREY T. ROETHE DALE E. POPE MATTHEW T. ROETHE Wisconsin Lawyers: Expert Advisers. Serving You. JOHN T. ROETHE (1911-1975)

Of Counsel: ROBERT G. KROHN KENNETH H. BUHROW

October 9, 2009

Mr. Arthur J. Murton, Director Federal Deposit Insurance Corporation Division of Insurance and Research 550 17th Street, NW Washington, DC 20429-9990

Dear Mr. Murton:

Your recent letter dated September 30, 2009, requests comments.

I am a Director of the Bank of Milton, Milton, Wisconsin. We are a solvent bank. We have greatly assisted in the recovery in our area by lending to small businesses. Most jobs are created by small businesses supported by local banking institutions.

Your proposal to obtain prepaid assessments is nothing short than obtaining an interest free loan from our institution to attempt to prop up bad banking practices by other banks. If we are required to make the prepaid assessments, we will have to take those funds out of availability for loans to small businesses. That puts a further squeeze on the solvent banks.

I would personally recommend that you do what everyone else is doing and that is to borrow from the Treasury necessary funds to prop up the liquidity needs. I personally feel that having prepaid assessments paid by all of the small banks would simply result in a further squeeze on the business recovery and hurt the financial structure of a number of small banks.

I am forwarding a copy of this letter onto my Congressman, Paul Ryan, to make him aware of our opposition to your draconian plan.

Respectfully submitted.

**KOETHE LLP ROETHE POPE** oethe itroethe@charter.net

kp pc Congressman Paul Ryan

 Reply to ≥ 24 N. Henry Street, PO Box 151, Edgerton, WI 53534, PH: 608-884-3391
 FAX: 608-884-7018

 321 E. Milwaukee Street, Janesville, WI 53545
 PH: 608-756-9710

 508 Campus Street, Ste. 101, Milton, WI 53563, PH: 608-868-4346
 FAX: 608-868-4348