

From: Clay Abrahamson [mailto:claya@hcb.us]  
Sent: Tuesday, March 24, 2009 11:57 AM  
To: Comments  
Subject: Opposition to RIN 3064-AD35: Proposed FDIC Special Assessment pursuant to 12 CFR Part 327

Clay Abrahamson  
Trust Administrator  
Hastings City Bank  
150 W Court St  
Hastings, MI 49058-1823

March 24, 2009

Robert E. Feldman  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429

Dear Robert Feldman:

I wish to express my outrage and disbelief at what has been proposed. I thought the idea behind stimulus and bank "bailouts" was to make credit available and get the economy moving. So why take the healthy sector of the banking business--the community banks--the banks that work and are lending and keeping the economy afloat--why confiscate their earnings in order to cover for the failures? It's another example of "good money" going after bad. This will only hurt our ability to help our local economy.

Our bank operates under the same conservative approach that has served it well for over 120 years. If left alone, our bank prospers. It is not our fault that an otherwise profitable year in 2008 was turned into the biggest loser since I've worked here only because of a couple of investments, including a Lehman brothers bond which was rated investment-grade days before it was defaulted on. Our loan portfolio remains solid. Now the FDIC is proposing to take what would be a huge piece of our budgeted operating income for 2009. How much more are we expected to endure? Where is the fairness here? We did not loan to people unable to repay. We did not spend a million dollars to decorate an office, nor did we fly our officers on our Lear Jet (we don't have one) to a Caribbean resort. We did not engage in any of the activities that have been criticized in the press and by Congress in recent weeks and yet we are being forced to pay for the transgressions of others.

Please reconsider this proposal. There has to be a better, more equitable way to insure the depositors' assets. Reduce the special assessment, and spread the cost over a long period of time. Use other sources of funds, such as borrowing from the Treasury, or using revenue from the Temporary Liquidity Guarantee Program.

Please give the community bankers the opportunity to thrive and continue to serve our customers and keep our local economy moving.

Sincerely,  
Clay Abrahamson Trust Administrator  
Hastings City Bank