May 3, 2005

Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17 Street, N.W.
Washington, D.C. 29429
By e-mail to comments@fdic.gov
Attention: Comments/LegalESS
Re: Community Reinvestment
RIN number 3064-AC89

Dear Sir:

As community bankers, we at OMNI BANK are pleased to support the proposal issued by the FDIC, amending the definition of a small institution to banks under $1 billion in assets. We believe this change will provide much needed regulatory relief for all community bankers. It seems appropriate to use our resources to actually serve our community, rather than to collect and maintain data and documents to prove to examiners we are meeting the needs of our community.

2004 marked the 16th anniversary of the founding of OMNI BANK. Our total assets increased by more than 13% from the previous year to top $467 million. Even more exciting was our expansion into new neighborhoods throughout the greater metropolitan New Orleans area in 2004, and continuing in 2005.

As we decided to open this institution, we gathered the founding members to consider a mission statement, the guiding principals for the life of the bank. Included in our mission is the statement "To commit resources to improving the overall quality of life in our community." There are over 200 employees at OMNI BANK, and all are working toward that goal. Compliance with the Community Reinvestment Act is something we take very seriously at OMNI BANK.

We do not need a complicated examination process to show that we are complying with the law. Further, we should not be compared to banks thousands of times larger. We strongly urge you to amend the definition of a small bank for CRA purposes to be an institution with less than $1 billion in assets, regardless of holding company status. Thank you for your consideration.

Sincerely,

James M. Hudson
President and Chief Executive Officer
OMNI BANK

c: Senator Mary Landrieu
        Senator David Vitter
        Representative Bobby Jindal