
From: Ed Storey [mailto:estorey@clackamascountybank.com]

Sent: Thursday, March 05, 2009 10:58 AM

To: Comments

Subject: Increased Assessment

The increased assessment is unfair. During the last crisis, Savings and Loans were run in an unsafe manner. Now some banks are running in an unsafe manner with concentrations in real estate loans and mortgage backed securities that are classic Savings and Loan behavior. When the funds were divided based on charter it was easier to see when were being asked to pay increased fees to cover bad management by institutions willing to take self destructive risks, like WAMU. When the government causes a run by speaking publicly about a weak institution like Indy bank, we are asked to pick up the tab. When huge banks buy brokerages that hold toxic assets to do the government a favor, we will be asked to pick up the tab. Well capitalized community banks with good management will not be able to pay ever increasing fees. You know this is only the beginning, with Citycorp trading at 1.09 per share. Bank of America has built a house of cards with Merrill and Countrywide. After a couple rounds of bank killing fdic assessments, you will come out of the fog of war and realize the challenge will only be resolved with a refcorp bonding routine that will take 40 years to repay. Regulation and oversight for community banks has been effective. Oversight of large institutions, brokerages, hedge funds, and insurance companies has been more of a cheerleader relationship. Stop the special assessment before you put community banks out of business.

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