
From: Gail Shires [mailto:Gail.Shires@cbswf.com]

Sent: Monday, March 30, 2009 11:27 AM

To: LLPComments

Subject: Legacy Loan Program

A determination needs to be made as to whether the LLP pools are based on gross or net dollars. If a bank has already written down its non-performing loans, in a declining and irrational market, then has to take less than dollar for dollar on the pool sale it would be an additional hit to its capital. Does a loan have to be currently on a non-accrual status, as of what date, to be considered for this pool?

Thanks,

Gail

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