

Evans, Sandra E

From: Jeanne Sweet [sweet@cwe-bank.com]
Sent: Tuesday, March 23, 2004 4:34 PM
To: regs.comments@ots.treas.gov
Subject: No 2004-06

March 23, 2004

Regulation Comments

Chief Counsel's Office

Office of Thrift Supervision

1700 G Street, NW.

Washington, DC 20552

Attention: 2004-06

Gentlemen,

This letter is in response to the proposed rules on amending the assessments and fees. The proposal states the examination fees would be replaced with semi-annual assessments on top-tier SLHC's. CWE Bancorp, Inc. owns 100% of Central West End Bank, AFSB. There are three personal trusts, which own a small percentage of the CWE Bancorp, Inc. Regulation and definition classify them as holding companies. These trusts evolved over the past twenty-five years as a result of the original directors accumulating bank stock for estate planning. These trusts were never intended to become SLHC's. It does not seem logical for these trusts to be considered top-tier SLHC's and incur the type of charges being proposed. CWE Bancorp, Inc. was formed with the purpose in mind to provide for future growth and stockholder liquidity.

Basically, proposal 12 CFR Part 502 is lengthy and confusing. Our first review of the proposal did not alert us to these changes, it took a second and third review to come to the result detailed below. If we are mistaken in our conclusion, please advise us as to the proper interpretation of the proposal.

As we understand the proposal, the semi-annual assessment would be \$12,000 (four top-tier holding companies times a base fee of \$3000) resulting in an annual fee of \$24,000. Since examinations occur every eighteen months, an examination would cost our bank approximately \$36,000. And that is in addition to the cost of the bank examination, which is currently calculated at approximately \$17,000 per year or \$25,500 per examination. Our last holding company examination fee was less than \$3,000. Even on a combined basis, if the assessment to the bank were eliminated, the new proposed assessment would represent a 26% increase to our company. An increase such as this is incomprehensible

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and unacceptable.

Central West End Bank is a small community bank serving the community around us. It appears that you are trying to put small businesses "out of business". A small business operates quite differently than the large entities and to be lumped together and exposed to the same charges, as a large bank is again unacceptable.

We hope there is considerable reconsideration on the impact of this proposed rule change.

Respectfully,

David T. Stoecker

Chairman and CEO

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