

Brick Capital CDC "We build communities...brick by brick."

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January 10, 2005

The Honorable James E. Gilleran, Director Office Of Thrift Supervision 1700 G Street, NW Washington, DC 20552

Re: CRA 2004-53, 2004-54

Dear Director Gilleran.

We, the Board of Directors of Brick Capital Community Development Corporation strongly oppose the OTS proposal to give CRA credit to thrift institutions for activities in rural and disaster areas with no benefit for low- and moderate-income people and places. It is also essential that large institutions remain accountable for investments and services as well as their lending. Thank you for your time and attention.

Sincerely,

Board of Directors

"What is the American Dream?