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**From:** morris hershman [mhershman@firststerling.com]  
**Sent:** Monday, January 24, 2005 3:20 PM  
**To:** Comments, Regs  
**Subject:** 2004-53 Community Reinvestment Act

We strongly recommend against any changes in CRA that would exclude or lessen its application to any banks. CRA is the incentive needed for all banks, even the smallest bank, to conduct their business in low income or other marginal neighborhoods and communities. Even though it is good business to do so, the pressure from the existing CRA enforcement and audit procedures ensures that no community will be bypassed for needed economic and residential development. We also oppose the OTS proposal to consider favorably rural community development activities that do not primarily benefit low-income people or communities.

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