



Ojai Community Bank
Santa Paula Community Bank
a division of Ojai Community Bank

March 2, 2009

Neil M. Barofsky
Special Inspector General
Office of the Inspector General
Troubled Asset Relief Program
1500 Pennsylvania Ave, N.W., Suite 1064
Washington, D.C. 20220

Dear Mr. Barofsky,

Per your request, Ojai Community Bank is providing a response to your letter dated February 6, 2009.

Ojai Community Bank applied for and received TARP funds to assist in providing strength to our balance sheet, increasing our lending limits and providing local access to increased government stimulus funding. The TARP funds are currently not segregated from other funds; however it is our only series of preferred stock in our capital account. Additional segregation may take place if required or internally advantageous to our tracking procedures. We have not specifically deployed funds to date earmarked as TARP money, as the funds were received only on January 30, 2009. We do not have any sub prime 1-4 real estate loans in our portfolio and have no 1-4 first trust deeds in foreclosure at this time. We are actively researching additional opportunities to deploy these funds to assist our local economy and the potential opportunities this capital provides our community bank.

In the area of executive compensation plans, a personnel committee meeting is scheduled for March 26, 2009 and will include an executive session with the board to review executive officer contracts within the 90 day requirement of the agreement. At this point in time, we do not have any executive officers that would be subject to modification of their employment agreements. If and when regulations in this area are finalized or modified, we will insure continued compliance. All agreements will have an addendum to provide for "clawback" language. Except for stock options that are granted at fair market value on the date of grant, the Bank does not currently have any other incentive programs for any staff member. The Bank does not have any long term or deferred forms of executive compensation. Future consideration of executive compensation will include strict compliance with Treasury regulations.

We look forward to implementing this portion of the United States Government Economic Stabilization program. If you have any additional questions or requests, please feel free to contact us at any time.

I certify the accuracy of all statements, representations, and supporting information provided, subject to the requirements and penalties set forth in Title 18, United States Code, Section 1001.

Sincerely,

A handwritten signature in black ink, appearing to read "D Brubaker". The signature is stylized with a large initial "D" and a cursive "Brubaker".

Dave Brubaker
Executive Vice President/COO