

March 9, 2009

Via Electronic Mail and U.S. Mail Mr. Neil M. Barofsky Special Inspector General Troubled Asset Relief Program 1500 Pennsylvania Ave., N.W. Suite 1064 Washington, D.C. 20220

Re: Use of TARP Funds - CONFIDENTIAL

Dear Mr. Barofsky:

Set forth below are the responses of Tennessee Commerce Bancorp, Inc. ("TNCC") and its wholly owned subsidiary, Tennessee Commerce Bank (the "Bank"), to the letter received from the Office of the Special Inspector General (the "SIG"), Troubled Asset Relief Program ("TARP"), dated February 6, 2009. For your convenience, we have repeated the SIG's written comments below prior to our responses.

- 1. A narrative response specifically outlining (a) your anticipated use of TARP funds; (b) whether the TARP funds were segregated from other institutional funds; (c) your actual use of TARP funds to date; and (d) your expected use of unspent TARP funds. In your response, please take into consideration your anticipated use of TARP funds at the time that you applied for such funds, or any actions that you have taken that you would not have been able to take absent the infusion of TARP funds.
- (a) As of November 7, 2008, the date that TNCC submitted its application for participation in the TARP Capital Purchase Program (the "CPP") under the Emergency Economic Stabilization Act of 2008 ("EESA"), TNCC anticipated using any funds received from the Department of the Treasury ("Treasury") under the CPP (the "TARP Funds") to continue the growth of the Bank and for the Bank and TNCC to remain "well capitalized" institutions.
- (b) On December 19, 2008, TNCC received the TARP Funds in an amount equal to \$30 million. Upon receipt, the TARP Funds were deposited into a TNCC account at the Bank and were not segregated from TNCC's other cash. The Bank's finance department tracks the TARP Funds in the TNCC account using spreadsheets for segregation. A redacted copy of such a spreadsheet is attached hereto as Exhibit A.
- (c) On December 31, 2008, TNCC injected \$10 million of the TARP Funds into the Bank and another on December 30, 2008, \$5 million into TCB Commercial Asset Services, Inc., a wholly owned subsidiary of TNCC ("TCB"). Evidence of the transfer of such amounts to the Bank and TCB is attached hereto as Exhibit B.

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Without the infusion of the TARP Funds, management believes that the Bank would have been forced to halt most of its lending activities in order to remain "well capitalized." At September 30, 2008, the Bank's total capital to risk-weighted assets was 10.18% and TNCC's total risk-based capital ratio was 9.87%. As of January 31, 2009, the Bank's total capital to risk-weighted assets was 10.83% and TNCC's total risk-based capital ratio was 12.18%. Between September 30, 2008 and January 31, 2009, the Bank made loans to third parties in an aggregate amount of \$140 million. Accordingly, without the infusion from the TARP Funds, loan growth would have been limited to replacing maturing loans and prepayments of existing loans. As a result of the infusion of TARP Funds, in January 2009 alone, the Bank booked \$22 million in net loan growth, as reflected in the balance sheet data attached hereto as Exhibit C.

Approximately 20%, or \$200 million, of the Bank's loan portfolio consists of small business loans each in an original amount of less than \$150,000. These loans are typically secured by equipment, with an emphasis on transportation equipment. As a result of weak economic conditions and high diesel prices, the transportation industry has encountered significant difficulty since late 2007, resulting in numerous defaults on loans from the Bank secured by equipment. When it repossesses certain of these assets, the Bank attempts to remarket such assets through a network of dealers who receive favorable pricing terms. Tennessee law prohibits the Bank from holding such collateral, however, for a period in excess of six months. Therefore, TNCC formed TCB in 2008 to remarket assets repossessed by the Bank that are not sold within six months after repossession. This process allows the Bank to continue its plan of orderly liquidation in compliance with Tennessee law. TNCC initially funded TCB with \$2 million in capital and an additional \$5 million was injected after receipt of the TARP Funds, allowing TCB to absorb additional losses incurred as a result of repossessed equipment.

- (d) TNCC anticipates using the remaining \$15 million of unspent TARP Funds to make further capital injections into the Bank and TCB, allowing for additional loan growth.
- 2. Your specific plans, and the status of implementation of those plans, for addressing executive compensation requirements associated with the funding. Information provided regarding executive compensation should also include any assessments made of loan risks and their relationship to executive compensation; how limitations on executive compensation will be implemented in line with Department of Treasury guidelines; and whether any such limitations may be offset by other changes to other, longer-term or deferred forms of executive compensation.

Our responses are organized below by the executive compensation requirements associated with funding under the CPP as required by Treasury, EESA, the American Recovery and Reinvestment Act of 2009 ("ARRA") and other law or regulation to the extent applicable to TNCC.

(a) <u>Compensation Committee Actions, Risk Analysis and Certifications.</u> TNCC's compensation committee (the "Committee") will review with TNCC's senior risk officer (the "Risk Officer"), on or before March 19, 2009, the incentive compensation arrangements of TNCC's senior executive officers, as defined in EESA (the "SEOs"), to ensure that such arrangements do not encourage the SEOs to take unnecessary and excessive risks that threaten the value of TNCC, in accordance with Section 111(b)(2)(A) of EESA, as amended by Section 7001 of ARRA. The Committee will certify that this review has occurred in the Compensation Committee Report included in TNCC's proxy statement in connection with its 2009 annual meeting of shareholders, which will be filed with the Securities and Exchange Commission (the "SEC").

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The Committee will also meet with the Senior Risk Officer, on an annual basis as required under the interim final rules promulgated by Treasury during the period in which TNCC's TARP obligation is outstanding, to discuss and review the relationship between TNCC's risk management policies and practices and the SEO incentive compensation arrangements.

(b) <u>PEO Certification</u>. TNCC's principal executive officer (the "PEO") will certify that the Committee reviewed the SEO incentive compensation arrangements with the Senior Risk Officer to ensure that such arrangements do not encourage the SEOs to take unnecessary and excessive risks that could threaten the value of TNCC. Such certification will be provided to the Chief Compliance Officer of TARP (with copies to the applicable transfer agent under the CPP) on or before April 18, 2009.

The PEO will also certify, on an annual basis as required under the interim final rules promulgated by Treasury during the period in which TNCC's TARP obligation is outstanding, that the Committee met at least once during the prior fiscal year with the Senior Risk Officer to discuss and review the relationship between the risk management policies and practices of TNCC and the SEO incentive compensation arrangements.

(c) "Clawback" Provisions, Golden Parachute Payments and Section 162(m)(5) of the Internal Revenue Code. In connection with TNCC's participation in the CPP, each of the SEOs executed agreements, as of December 18, 2008 (the "Memorandum Agreements"), limiting his right to receive or retain certain compensation. The Memorandum Agreements modify all compensation arrangements of the SEOs, including compensation, bonus and incentive arrangements, as well as other compensatory benefit plans. Pursuant to the Memorandum Agreements, all bonus or other incentive payments to the SEOs based on materially inaccurate financial statements or other materially inaccurate performance metric criteria are subject to recovery by TNCC during the period in which TNCC is participating in the CPP. Further, the Memorandum Agreements prevent the payment of "golden parachute payments" upon an "applicable severance from employment," as those terms are defined in EESA. Finally, the Memorandum Agreements confirm that TNCC is prevented from deducting any compensation paid to each SEO in excess of the limits prescribed in Section 162(m)(5) of the Internal Revenue Code.

The PEO will certify, on an annual basis as required under the interim final rules promulgated by Treasury during the period in which TNCC's TARP obligation is outstanding, that TNCC has limited the deduction for remuneration for federal income tax purposes as required by Section 162(m)(5) of the Internal Revenue Code.

- (d) Say on Pay. In accordance with ARRA and guidance issued by the SEC on February 26, 2009, TNCC will solicit shareholder approval of the compensation paid to SEOs at its 2009 annual meeting of shareholders and annually thereafter during the period in which TNCC's TARP obligation is outstanding. This vote will be non-binding on TNCC's board of directors.
- (e) Other ARRA Requirements. The Committee is currently comprised entirely of independent directors, as that term is defined in the corporate governance rules of The NASDAQ Stock Market. The Committee's charges will be broadened to comply with the requirement that it meet at least semi-annually during the period in which TNCC's TARP obligation is outstanding to discuss and evaluate employee compensation plans in light of an assessment of any risk posed to TNCC from such plans.

TNCC will adopt a company-wide policy to limit excessive or luxury expenditures on entertainment, events, office and facility renovations, aviation or other transportation services and other activities.

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TNCC's Chief Executive Officer and Chief Financial Officer (or their equivalent) will certify to the SEC that TNCC is in compliance with the requirements of Section 111 of EESA, as amended by Section 7001 of ARRA.

Once regulations are promulgated under Section 7001 of ARRA, the Committee will determine what additional changes to the compensatory arrangements with the SEOs may be necessary and will cause such changes to be made in accordance with and to the extent required by any such regulations.

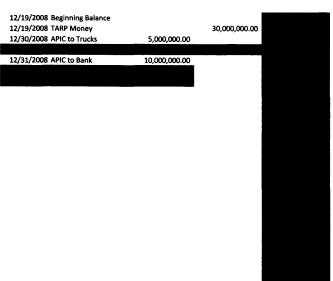
If you have any questions regarding the above responses, please do not hesitate to call the undersigned at (b) (6)

The undersigned Chief Financial Officer of Tennessee Commerce Bancorp, Inc. hereby certifies that he has reviewed this response and supporting documents, and, based on his knowledge, this response and the supporting documents do not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading.

Sincerely,

Frank Perez, Chief Financial Officer

Exhibit A



Non Tarp Money Beg Bai 12/31/2008

TARP Money 30,000,000.00 5,000,000.00 APIC to Trucks 10,000,000.00 APIC to Bank 15,000,000.00

INST : 038 REPORT: PRS/6200-002 19.02.7 SYSTEM: 01/21/09 07:45	FINANCIAL M	AL ASSETS SERVICES ANACEMENT SYSTEM T STATEMENT		RUN	PAGE: 3 DATE: 01/20/09 THRU: 12/31/08	Exhibit	B
ACCOUNT # BR TITLE/DESCRIPTION	DATE FMS ADDR	PRH ADDR VOUCHER VEND	DEBIT AMOUNT	CREDIT AMOUNT	BALANCE		
27940001 0 ACCOUNTS PAYABLE	TYPE: LIABILITY 11/30/08	* CYCLE: 01 * BALANCE FORWARD * ** ACCOUNT TOTALS **	.00	.00	.00		
27950001 O ACCOUNTS PATABLE SETTI	LEMENT TYPE: LIABILITY 11/30/08	* CYCLE: 01 * BALANCE FORWARD * ** ACCOUNT TOTALS **	.00	.00	.00		
27960001 O ACCOUNTS PAYABLE ADJUS	BINENT TYPE: LIABILITY 11/30/08	* CYCLE: 01 * BALANCE FORWARD * ** ACCOUNT TOTALS **	.00	. 00	.00 .00		
28000001 0 OTHER LIABILITIES loan interest expense December 2008 payoff note from HC to TCB CAS	TYPE: LIABILITY 11/30/08 12/18/08 1218970003 12/30/08 1230970005	** CCCURT O1 * BALANCE FORWARD * 66000002 66000004 ** ACCOUNT TOTALS **	30,557.21 38,557.21	6,327.39 6,327.39	32,229.82 38,557.21 .00 .00		
30000001 O COMMON STOCK	TYPE: LIABILITY 11/30/08	CYCLE: 01 * BALANCE FORWARD * ** ACCOUNT TOTALS **	.00	.00	2000,000.00		
30040001 0 SURPLUS	TYPE: LIABILITY	* CYCLE: 01 * BALANCE FORWARD * ** ACCOUNT TOTALS **	.00	.00	.00 .00		
30046001 0 OTHER PAID-IN CAPITAL APIC from Holding Company to TCB CAS	TYPE: LIABILITY 11/30/08 12/30/08 1230970003	* CYCLE: 01 * BALANCE FORWARD * 66000002 ** ACCOUNT TOTALS **	.00	5000,000.00 5000,000.00	.00 \$000,000.00 \$000,000.00		
30050001 O UNDIVIDED PROFITS CLOSING STATE EXCISE TAX CLOSING FEDERAL INCOME TAX CLOSING INTEREST EXPENSE CLOSING GAIN (LOSS) ON SALE	TYPE: LIABILITY 11/30/08 12/31/08 120900008 12/31/08 120900006 12/31/08 120900004 12/31/08 120900002	CYCLE: 01 * BALANCE FORWARD * ** ACCOUNT TOTALS **	30,557.21 92,525.91 131,083.12	4,652.04 42,987.24 47,639.28	.00 4,652.04 47,639.28 9,082.07 83,443.84- 83,443.84-		
41150001 O INTEREST INCOME	TYPE: INCOME 11/30/08	CYCLE: 01 * BALANCE FORWARD * ** ACCOUNT TOTALS **	.00	. 00	. 00 . 00		

INST: 039 TERMESSEE COMMERCE BANK PACE: 484 REPORT: FES/6200-002 19.02.7 FINANCIAL MANAGEMENT SYSTEM RUN DATE: 01/20/09 SYSTEM: 01/21/09 07:45 ACCOUNT STATEMENT PROCESSED THRU: 12/31/08

5151ML 01/21/05 07.45		ACCOUNT STATEMENT	11		PROCESSED	IRRU. 12/31/00
ACCOUNT # BR TITLE/DES	SCRIPTION DATE F	MS ADDR PRM ADDR	VOUCHER VEND	DEBIT AMOUNT	CREDIT AMOUNT	BALANCI
27980001 O RECOURSE OBLI	GATION TYPE	: LIABILITY CYCLE: 01	* CONTIN	TUED PAGE 2	*	
loan pool 912	12/31/08 123				8,599.05	404,633.27
loan pool 913	12/31/08 11				9,250.86	413,894.13
loan pool 89	12/31/08 123				9,825.50	423,709.63
	12/31/08 123					
loan pool 93					9,867.17	433,576.80
loan pool 94	12/31/08 11		UNI TOTALS **	12,959.86	10,611.57 156,168.33	444,188.37 444,188.37
		acc.	OMI TOTALS	12,555.00	130,100.33	444,100.57
28000001 1 OTHER LIABILI		: LIABILITY CYCLE: 01				
	11/30/08		ICE FORWARD *			.00
		** ACC	OUNT TOTALS **	.00	.00	. 00
28100001 1 CDARS SETTLER	SENT-INCOMING REP TYPE	: LIABILITY CYCLE: 0	l			
	11/30/08	* BALAI	CE FORWARD *			8,826.37
CDARS action report activity	Dec 17th 12/17/08 122	1970211 40000017		36.79		8,789.58
CDARS Action report activity				1,823.55		6,966.03
	22, 23, 23		OUNT TOTALS **	1,860.34	.00	6,966.03
		1000		2,000.01		3,355.00
30000001 1 COMMON STOCK		: LIABILITY CYCLE: 0:				
	11/30/08	* BALAI	CE FORWARD *			908,720.00
		** ACC	CUNT TOTALS **	.00	.00	908,720.00
30040001 1 SURPLUS	TYPE	: LIABILITY CYCLE: 0.	<u>.</u>			
	11/30/08	* BALAI	CE FORWARD *			8178,480.00
	22, 11, 11		OUNT TOTALS **	.00	.00	8178,480.00
						,
30045001 0 NOT IN USE		: EXPENSE CYCLE: 0				
	11/30/08		CE FORWARD *			.00
		** ACC	OUNT TOTALS **	.00	.00	.00
30046001 0 OTHER PAID-IN	J CADITAL TVD#	: LIABILITY CYCLE: 0				
COCCOCCI C CIMER PRID II	11/30/09		CE FORWARD *			60078,074.47
APIC From Holding Company	12/31/08 123		CE PURMANO -		10000,000.00	70078,074.47
AFIC From Holding company	12/31/08 123		OUNT TOTALS **	.00	10000,000.00	
		** ACC	JUNI TUTALS	.00	10000,000.00	70078,074.47
30050001 1 UMDIVIDED PRO	FITS TYPE	: LIABILITY CYCLE: 0.	ι			
	11/30/08	* BALAI	CE FORWARD *			17750,379.15
CLOSING RETURNED DEPOSIT FEE	INCOME 12/31/08 12	0900078			10.00	17750,389.15
CLOSING STOP PHT INCOME ACCOU					250.00	17750,639.15
CLOSING ATH SURCHARGE FEE	12/31/08 12				308.00	17750,947.15
CLOSING CHECK FREE INCOME	12/31/08 12				336.56	17751,283.71
CLOSING SAFE DEPOSIT BOX RENT					900.00	17752,183.71
CLOSING PED FUNDS SOLD - PED					1,331.61	17753,515.32
CLOSING FED FUNDS SOLD - MBC	12/31/08 12				1,603.21	17755,118.53
CLOSING CHECKING LINE OF CREE					4,819.13	17759,937.66
	22, 42, 50 42				1,015.10	

Exhibit C

Net loans at January 31, 2009 Net loans at December 31, 2008 1,047,211,532.94 (A)

1,024,724,134.91 (B)

22,487,398.03 Net loan growth January 2009

INST : 039 REPORT: FMS/3211-001 19.02.7 SYSTEM: 02/11/2009 07:40

TENNESSEE COMMERCE BANK FINANCIAL MANAGEMENT SYSTEM DAILY STMT OF CONDITION-COMBINED PAGE: 2 RUN DATE: 01/31/2009 PROCESSED THRU: 01/31/2009

	CURRENT BALANCE	PREVIOUS BALANCE	NET BAL CHANGE	AVG BAL JAN'09	AVG BAL JAN-JAN 2009
11575001 INDIRECT PARTICIPATIONS	11,726,690.69-	9,497,688.67-	2,229,002.02-	11,701,994.54-	11,701,994.54
11580001 SMALL TICKET LOANS	244,545,657.33	245,063,828.28	518,170.95-	244,956,279.24	244,956,279.24
11590001 STL LOAN POOL SALES	68,535,974.29-	71,154,085.03-	2,618,110.74	68,654,329.00-	68,654,329.00
11595001 TAX LEASES	67,610,157.78	68,323,818.47	713,660.69-		67,959,182.26
11596001 UNEARNED INTEREST INCOME	14,833,588.87-	15,086,259.70-	252,670.83	15,053,657.01-	
11597001 SERVICE FEE PAYABLE	212,251.11-	213,256.61-	1,005.50	213,126.86-	
TOTAL COMMERCIAL LOANS	659,754,049.98	645,740,780.89	14,013,269.09	655,504,637.35	655,504,637.35
11600001 CONSUMER LOANS	2,915,953.82	2,842,456.33	73,497.49		2,890,153.57
OTAL CONSUMER LOANS	2,915,953.82	2,842,456.33	73,497.49	2,890,153.57	2,890,153.57
11700001 CREDIT CARD - REGULAR	70,813.82	67,632.22	3,181.60	72,115.07	72,115.07
11720001 CREDIT CARD - PLATINUM	148,897.15	151,817.32	2,920.17-		147,878.04
11750001 CREDIT CARD - COMMERCIAL	390,968.74	339,359.15	51,609.59	383,608.10	383,608.10
11780001 CHECKING LINE OF CREDIT	34,551.23	43,770.31	9,219.08-		31,361.37
11790001 ITEMS IN TRANSIT-CREDIT CARDS	23,764.46	39,175.99	15,411.53-		20,220.35
11795001 ITEMS IN TRANSIT-MERCHANT CARD	.00	.00	.00	.00	.00
11797001 ITEMS IN TRANSIT-ATM	26,773.12- 642,222.28	30,284.43- 611,470.56	3,511.31 30,751.72	3,129.19- 652,053.74	3,129.19 652,053.74
STAL CREDIT CARD LOANS	642,222.28	611,470.56	30,751.72	652,053.74	652,053.74
11800001 COMMERCIAL CONSTRUCTION LOANS	143,934,125.38	138,684,335.69	5,249,789.69	141,132,818.53	141,132,818.53
11820001 COMMERCIAL REAL ESTATE LOANS	189,989,502.04	188,982,605.87	1,006,896.17	189,589,164.27	189,589,164.27
11830001 CONSUMER CONSTRUCTION LOANS	44,619,338.38	44,547,773.01	71,565.37	44,543,263.33	44,543,263.33
11850001 REAL ESTATE LOANS (1-4) FAMILY	34,355,670.63	34,076,510.32	279,160.31	34,486,765.05	34,486,765.05
11870001 HOME EQUITY LOANS	7,688,600.78	7,489,040.78	199,560.00	7,629,460.54	7,629,460.54
11890001 LOAN PART- REAL ESTATE	24,024,671.79-	23,169,673.16-	854,998.63-		
OTAL REAL ESTATE LOANS	396,562,565.42	390,610,592.51	5,951,972.91	393,372,702.90	393,372,702.90
12040001 OVERDRAFTS	82,005.50	117,358.98	35,353.48-		183,541.25
COTAL OVERDRAFTS	82,005.50	117,358.98	35,353.48-	183,541.25	183,541.25
12500001 LOANS IN PROCESS	45,727.62-	735,917.04	781,644.66-		
12510001 LOAN TRANSFERS IN PROCESS	.00	.00	.00	.00	.00
12520001 NONPOST LOAN DEBIT	.00	982,056.66	982,056.66-		86,502.72
12525001 NONPOST LOAN CREDIT	12,919.33-	3,462,519.68-	3,449,600.35	150,148.96-	· ·
12530001 DDL LOANS IN PROCESS	.00	.00	.00	.00	.00
12540001 NONPOST DDL LOAN DEBIT	.00	.00	.00	.00	.00
12545001 NONPOST DDL LOAN CREDIT	.00	.00	.00	.00	.00
TOTAL LOANS IN PROCESS	58,646.95-	1,744,545.98-	1,685,899.03	106,360.49-	106,360.49
12600001 RESERVE LOAN LOSSES	11,517,932.12-	12,341,475.29-	823,543.17	11,916,734.04-	
12610001 LOAN RECOVERIES	1,168,684.99-	1,112,503.09-	56,181.90-		
OTAL RESERVE FOR LOAN LOSS/RECOVERIES	12,686,617.11-	13,453,978.38-	767,361.27	13,044,095.20-	13,044,095.20
JET LOANS	1,047,211,532.94	1,024,724,134.91	22,487,398.03	1,039,452,633.12	1,039,452,633.12
TOTAL UNEARNED INTEREST-LOANS	.00	.00	.00	.00	.00
15020001 MANUAL DEFERRED LOAN FEES	2,004,645.09-	1,985,786.05-	18,859.04-	1,987,326.17-	1,987,326.17
15030001 DEFERRED LOAN EXPENSE	537,110.94	532,333.50	4,777.44	532,722.89	532,722.89
15050001 DEFERRED FEES IN-PROCESS	.00	. 00	.00	.00	.00
TOTAL DEFERRED LOAN FEES	1,467,534.15-	1,453,452.55-	14,081,60-	1,454,603.28-	1,454,603.28
CANS-NET UNEARNED FEES & RESERVES	1,045,743,998.79	1,023,270,682.36	22,473,316.43	1,037,998,029.84	1,037,998,029.84
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TENNESSEE COMMERCE BANK FINANCIAL MANAGEMENT SYSTEM DAILY STMT OF CONDITION-COMBINED PAGE: 2 RUN DATE: 12/31/2008 PROCESSED THRU: 12/31/2008

	CURRENT BALANCE	PREVIOUS BALANCE	NET BAL CHANGE	AVG BAL DEC'08	AVG BAL JAN-DEC 2008
11575001 INDIRECT PARTICIPATIONS	9,497,688.67-	9,588,594.16-	90,905.49	9,548,629.23-	9,054,002.10-
11575001 INDIRECT PARTICIPATIONS 11580001 SMALL TICKET LOANS	245,063,828.28	246,713,625.61	1,649,797.33-		237,767,420.53
11590001 STALLD TICKET DOARS	71,154,085.03-	47,446,295.90-	23,707,789.13-		50,010,477.34-
11595001 TAX LEASES	68,323,818.47	69,246,521.19	922,702.72-		46,011,805.38
11596001 UNEARNED INTEREST INCOME	15,086,259.70-	15,341,491.14-	255,231.44	15,174,702.65-	11,904,546.33-
11597001 GNEARNED INTEREST INCOME	213,256.61-	228,917.11-	15,660.50	217,885.86-	247,861.24-
TOTAL COMMERCIAL LOANS	645,740,780.89	658,648,784.07	12,908,003.18-		593,447,721.77
11600001 CONSUMER LOANS	2,842,456.33	2,718,633.53	123,822.80	2,757,601.35	2,759,129.97
TOTAL CONSUMER LOANS	2,842,456.33	2,718,633.53	123,822.80	2,757,601.35	2,759,129.97
11700001 CREDIT CARD - REGULAR	67,632.22	72,898.45	5,266.23-	70,686.59	64,804.92
11720001 CREDIT CARD - PLATINUM	151,817.32	155,050.08	3,232.76-	151,906.79	145,911.85
11750001 CREDIT CARD - COMMERCIAL	339,359.15	355,950.51	16,591.36-	376,244.63	353,798.71
11780001 CHECKING LINE OF CREDIT	43,770.31	30,721.03	13,049.28	31,652.63	32,449.49
11790001 ITEMS IN TRANSIT-CREDIT CARDS	39,175.99	9,548.00-	48,723.99	7,227.52	607.55-
11795001 ITEMS IN TRANSIT-MERCHANT CARD	.00	.00	.00	.00	.00
11797001 ITEMS IN TRANSIT-ATM	30,284.43-	57,697.16-	27,412.73	1,435.72-	14,667.17-
TOTAL CREDIT CARD LOANS	611,470.56	547,374.91	64,095.65	636,282.44	581,690.25
11800001 COMMERCIAL CONSTRUCTION LOANS	138,684,335.69	143,125,969.31	4,441,633.62-	143,682,657.16	118,117,974.69
11820001 COMMERCIAL REAL ESTATE LOANS	188,982,605.87	179,825,426.21	9,157,179.66	182,079,394.41	170,168,957.49
11830001 CONSUMER CONSTRUCTION LOANS	44,547,773.01	34,294,870.48	10,252,902.53	40,006,027.03	34,107,320.04
11850001 REAL ESTATE LOANS (1-4) FAMILY	34,076,510.32	36,180,090.65	2,103,580.33-		31,140,957.91
11870001 HOME EQUITY LOANS	7,489,040.78	6,487,311.28	1,001,729.50	6,419,895.56	5,957,667.91
11890001 LOAN PART- REAL ESTATE	23,169,673.16-	18,372,154.96-	4,797,518.20-	19,289,662.96-	15,856,362.58-
TOTAL REAL ESTATE LOANS	390,610,592.51	381,541,512.97	9,069,079.54	388,379,177.37	343,636,515.46
12040001 OVERDRAFTS	117,358.98	163,975.38	46,616.40-	234,175.96	219,421.77
TOTAL OVERDRAFTS	117,358.98	163,975.38	46,616.40-	234,175.96	219,421.77
12500001 LOANS IN PROCESS	735,917.04	5,890.97-	741,808.01		851,993.91
12510001 LOAN TRANSFERS IN PROCESS	.00	.00	.00	2,250.25-	2,989.45-
12520001 NONPOST LOAN DEBIT	982,056.66	.00	982,056.66	155,656.64	171,324.30
12525001 NONPOST LOAN CREDIT	3,462,519.68-	22,726.71-	3,439,792.97-	227,912.42-	246,512.24-
12530001 DDL LOANS IN PROCESS		.00	.00	.00	.00
12540001 NONPOST DDL LOAN DEBIT	.00	.00	.00	.00	.00
12545001 NONPOST DDL LOAN CREDIT	.00	.00	.00	16.12-	1.37-
TOTAL LOANS IN PROCESS	1,744,545.98-	28,617.68-	1,715,928.30-	137,519.12	773,815.15
12600001 RESERVE LOAN LOSSES	12,341,475.29-	11,192,060.24-	1,149,415.05-	10,995,517.99-	10,479,452.55-
12610001 LOAN RECOVERIES	1,112,503.09-	1,052,138.92-	60,364.17-	1,078,626.86-	1,029,294.66-
TOTAL RESERVE FOR LOAN LOSS/RECOVERIES	13,453,978.38-	12,244,199.16-	1,209,779.22-	12,074,144.85-	11,508,747.21-
NET LOANS	1,024,724,134.91 B	1,031,347,464.02	6,623,329.11~	1,042,430,207.07	929,909,547.16
TOTAL UNEARNED INTEREST-LOANS	.00	.00	.00.	.00	.00
15020001 MANUAL DEFERRED LOAN FEES	1,985,786.05-	1,976,378.27-	9,407.78-	1,937,770.57-	1,906,056.72-
15030001 DEFERRED LOAN EXPENSE	532,333.50	530,710.28	1,623.22	520,989.86	504,657.25
15050001 DEFERRED FEES IN-PROCESS		.00	.00	.00	.00
TOTAL DEFERRED LOAN FEES	1,453,452.55-	1,445,667.99-	7,784.56-	1,416,780.71-	1,401,399.47-
LOANS-NET UNEARNED FEES & RESERVES	1,023,270,682.36	1,029,901,796.03	6,631,113.67-	1,041,013,426.36	928,508,147.69
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