

Building communities. Changing lives.

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

Re: Southern Bancorp, Inc. OMB Control Number 1505-0212

Dear Mr. Barofsky:

Please accept this response to your letter dated February 6, 2009.

Question One:

- (a) Consistent with our application for TARP funding, Southern Bancorp intends to use TARP funds to expand its mission as a Community Development Financial Institution into additional distressed and predominately minority communities. Special services that will be provided by Southern Bancorp in these new communities include but are not limited to micro-lending, individual development accounts matched savings programs, the volunteer income tax assistance program of the Internal Revenue Service, financial literacy training, adult education assistance, small business and consumer lending, home buyer counseling and foreclosure prevention.
- (b) TARP funds are segregated from other institutional funds.
- (c) TARP funds have not been used as of the date of this letter due to our need to prepare our management and operational infrastructure for expanded service offerings. We (b) (4)

(d)

(b) (4)

Question Two:

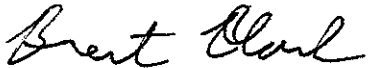
(b) (4)

Since Southern Bancorp received \$11 million of TARP funds, the Chief Executive Officer of Southern Bancorp is the only individual within Southern Bancorp who is restricted as to bonus payment.

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

Please call me if you have any questions about the above response at (b) (6)

Sincerely,



Brent Black
Chief Financial Officer