



*Serving The Community Since 1903*

DISSEMINATION  
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July 6, 2000

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Office of Thrift Supervision  
Manager, Dissemination Branch, Records Management & Information Policy  
1700 G Street, N. W.  
Washington, DC 20552

RE: TR-231  
CRA Sunshine Provisions

To Whom It May Concern:

I reviewed the proposed rule and would like to offer some suggestions for consideration. Being in an urban area we receive a number of requests for donations to very good organizations. However, being a smaller institution we can't honor all the requests and the groups we do help out sometime don't get the amount of money they would like to receive from us.

If possible I believe that the minimal grant amount should be lowered to \$1,000 instead of \$10,000. By doing this I can help out more organizations that provide a real CRA need to the community. These include school groups, youth organizations, counseling agencies and community groups that provides pivotal services to the neighborhoods.

If the grant amount is lowered to \$1,000 then we could get consideration for our CRA rating and also be able to benefit more people. If the limit is left at \$10,000 then there are less groups that we would help. In all honesty some of the organizations do not need \$10,000 and would be happy with a few thousand. For example, last year a non profit was trying to acquire a number of vacant and abandoned properties in a low income area, their plan was to rehabilitate these homes and provide housing for people. They needed a market study done of the neighborhood that cost them \$3,500. They told me they went to over ten banks and only our bank and one other bank would give them money for this study. I am happy to say that this organization is well on their way to seeing this project become a reality. My point is lower the amount and get more banks involved and benefit more worthy non profit organizations.



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It is my belief that we could get more banks on Board making these grants and it is a positive situation for everybody. I hope you will consider my suggestion and lower the grant amount to \$1,000. Also for the lower grant amounts under \$10,000, please try not to make the reporting requirement and documentation too complicated. You must remember that many of these non profits are run by volunteers who receive no salary. If you would like to discuss this or need any further information, please contact me. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Martin G. Bednarek". The signature is fluid and somewhat stylized, with the first letters of the first and last names being prominent.

MARTIN G. BEDNAREK  
CEO/EVP

mgb/bas