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Comptroller of the Currency  
Administrator of National Banks

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Memphis Field Office  
57 Germantown Court, Suite 309  
Memphis TN 38108

October 24, 2001

Ms Krista Lewis  
Community Reinvestment Officer  
First Citizens National Bank  
P.O. Box 370  
Dyersburg, TN 38025

Dear Ms Lewis:

This is in response to your questions pertaining to the bank's investment in or loans to the Senior Crimestoppers Program. The program that you refer to is a Crimestoppers Program for low and moderate-income nursing home residents. It is identical to the program that is the topic of the letter from Ralph Sharpe, OCC's Deputy Comptroller for Community and Consumer Policy, dated March 20, 2000. In that letter, Deputy Comptroller Sharpe states that a bank would qualify for CRA credit for a loan to or investment in the program.

As such, this should earn your bank CRA credit as an investment or a loan as long as it benefits your assessment area. The credit given will be for the full amount of the investment or loan or both. We have also conferred with Calvin Hagins, the Southeast District's ADC for Compliance Operations, who has concurred with these statements.

In regards to the question you pose on whether this investment should be accounted as an investment or a loan (or split between the two). I defer this decision to management. If the goal is to improve a CRA component, then obviously this would be a controlling factor in the decision process.

Please retain this letter should additional documentation be requested during upcoming CRA performance evaluation reviews.

Sincerely,

Paul E. Robertson  
Assistant Deputy Comptroller