

Mail Stop 4561

February 15, 2007

Mr. Jeffrey L. Nash
President and Chief Executive Officer
Treaty Oak Bancorp, Inc.
101 Westlake Drive
Austin, TX 78746

Re: Treaty Oak Bancorp, Inc.
Form 10-KSB for the Fiscal Year Ended September 30, 2006
Filed December 29, 2006
File No. 333-112325

Dear Mr. Nash:

We have completed our review of your Form 10-KSB and related filings and have no further comments at this time.

Sincerely,

John P. Nolan
Accounting Branch Chief