

Via Facsimile and U.S. Mail  
Mail Stop 6010

October 6, 2006

Mr. Mark A. Oliver  
President and Chief Executive Officer  
Citizens, Inc.  
400 East Anderson Lane  
Austin, Texas 78752

**Re: Citizens, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2005**  
**Filed on March 16, 2006**  
**File No. 000-16509**

Dear Mr. Oliver:

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

Sincerely,

Joe Roesler  
Accounting Branch Chief