

Via Facsimile and U.S. Mail
Mail Stop 4720

September 29, 2009

Harold E. Riley
Chairman 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, 2008
Filed March 13, 2009
Schedule 14A Filed April 20, 2009
File No. 000-16509

Dear Mr. Riley:

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

Sincerely,

Joel Parker
Accounting Branch Chief