

November 25, 2008

Annete Banks
Chief Executive Officer
Habersham Bancorp
282 Historic Highway 441 North
Cornelia, Georgia 30531

RE: Habersham Bancorp, Inc.
Pre 14A
File Number 0-13153

Dear Ms. Banks:

We have completed our review of your Preliminary Proxy Statement on Schedule 14A and have no further comments at this time.

Sincerely,

David S. Lyon
Senior Financial Analyst