

January 31, 2008

Mr. Samuel J. Cox  
Chief Financial Officer  
Citizens Bancshares Corporation  
175 John Wesley Dobbs Avenue, N.E.  
Atlanta, GA 30303

**Re:**

**Form 10-K for the fiscal year ended December 31, 2006**  
**File No. 001-14913**

Dear Mr. Cox:

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

Sincerely,

Hugh West  
Branch Chief