

**From:** Fox, James [mailto:fox@law.stetson.edu]  
**Sent:** Saturday, November 08, 2008 8:00 AM  
**To:** Comments  
**Subject:** RIN # 3064-AD37

I am writing as a Board member for Gulfcoast Legal Services in St. Petersburg, Florida and a former President of the Board, and also as a professor of Poverty Law. I strongly urge you to follow the ABA recommendation and include IOLTA accounts in the unlimited coverage for business accounts. IOLTA accounts are critical for funding the operations of essential legal services for the poor, and in a time of economic crisis, the help provided for poor clients in resolving disputes and stabilizing their lives is even more important. Adding these accounts to the guaranty and insurance program will have important positive ripple effects in favor of this vulnerable population.

Regards,

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