

**From:** Cam Ferenbach [mailto:cferenbach@lionelsawyer.com]  
**Sent:** Monday, November 10, 2008 3:51 PM  
**To:** Comments  
**Subject:** Spam: RIN # 3064-AD37 Public Comment In Support of Full FDIC Insurance Coverage for IOLTA Accounts

Dear Sir or Madam,

As an attorney I am familiar with the great benefit to our community made possible by Nevada's IOLTA program.

I urge you to include Coverage of IOLTA Accounts, without dollar limitations, as part of the Temporary Liquidity Guarantee Program.

Funds are placed in IOLTA accounts when the amount involved and the expected time of deposit preclude earning of interest for the individual client, net of banking charges and administrative fees. These accounts act as clearing accounts for pooled client funds, and the fact that collective interest is used to fund access to justice programs by a charitable institutions does not change that function.

Traditionally the FDIC and Federal Reserve have granted exemptions for IOLTA accounts to banking regulations that prohibited payment of interest on demand accounts.

Given our present economic circumstances, now is not the time to inhibit a proven program which promotes access to justice for civil litigants who would not otherwise be able to engage the services of a private attorney.

Thanks you for considering this comment.

Cam Ferenbach

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LIONEL SAWYER & COLLINS

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