

From: VandeWalle, Justice Gerald [mailto:GVandeWalle@ndcourts.gov]

Sent: Tuesday, November 11, 2008 1:06 PM

To: Comments

Cc: Neumann, William

Subject: FDIC RIN 3064-AD37

I urge you to include IOLTA in the TLGP regulations. The North Dakota Supreme Court adopted its IOLTA rules, Administrative Rules 24, 24.1 and 24.2 in 1987 and 1988. The IOLTA funds are a significant part of supporting civil legal services for the poor as well as for public education relating to the courts and legal matters. I am concerned that unless IOLTA is included in the TLGP regulations our lawyers will be compelled to transfer their trust accounts into non interest bearing accounts in order to assure the protection of their clients funds. This would be a severe blow to providing civil legal services to the poor in North Dakota. Thank you for your consideration.

Gerald VandeWalle

Chief Justice of North Dakota