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To: LLPComments

Subject: Legacy Loans Program

There is endless variety in gaming the public-private partnership formula presented in the plan. The most extreme scheme can be called "92-8-8 bailout money machine".

Let's say that I am a bank and I have an asset on books at \$100.

Step 1. I form public private partnership and bid \$108. FDIC will lend me \$92, FED will give me \$8, that is \$100 from government, I pay \$8.

Step 2. I stop paying the non recourse loan for \$92, and FDIC seizes the asset. My 1/2 of the partnership lost \$8. The bank has \$100.

How is this prevented?

A. Wells.