From: Valderrama, Teresa (HOU) [mailto:ValderrT@jacksonlewis.com]

Sent: Thursday, November 13, 2008 2:58 PM

**To:** Comments

Cc: Valderrama, Teresa (HOU) Subject: RIN # 3064-AD37

I am a 20 year Houston, Texas lawyer who has seen firsthand how the interest used on IOLTA accounts (interest bearing accounts where client funds are escrowed temporarily before being distributed, and in many cases exceeding \$250,000 in value – such as a payment on a major settlement) provides a huge win to the least-served in our communities with respect to legal services.

In Texas, the interest on IOLTA accounts is paid out for the benefit of pro bono services. These assist our legal services organizations to provide representation to those who otherwise wouldn't have a place to go – migrant workers, those who speak little English, those who are less educated. A huge part of the legal services to the poor is funded by the interest on the IOLTA account. It does not go to the lawyer; it goes to the underrepresented in our society.

PLEASE make sure that interest-bearing IOLTA accounts over \$250,000 are insured or protected, or lawyers will have no choice but to move their clients funds elsewhere during the temporary periods where funds are being held before distribution to clients.

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