

**The Bob Richardson Law Firm  
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Austin, Texas 78701**

Ms. Sheila C. Bair  
Chair, Federal Deposit Insurance Corporation  
550 17th Street, NW  
Room 6028  
Washington, DC 20429

Dear Chairman Bair:

There is no good reason to obliterate IOLTA programs nationwide (which the interim TLGP rules would do) since neither the attorney handling the case nor the client whose funds are deposited in an IOLTA account receive any of the interest which goes instead to legal services for the poor.

If the FDIC cannot consider IOLTA accounts to be non-interest bearing, we would ask in the alternative that an exception be made in the TLGP interim rules providing unlimited deposit insurance to IOLTA accounts.

It seems to me that the devastating effects on access to the civil justice system are the result of the Doctrine of Unintended Consequences in that such denial certainly was not intended in the underlying legislation nor the TLGP interim rules.

I urge the FDIC to consider IOLTA accounts as non-interest bearing accounts under the terms of the TLGP.

Sincerely,  
Bob Richardson  
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