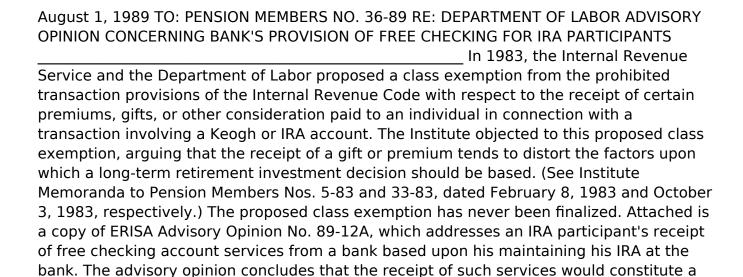


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DEPARTMENT OF LABOR ADVISORY OPINION CONCERNING BANK'S PROVISION OF FREE CHECKING FOR IRA PARTICIPANTS



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violation of section 4975(c)(1) of the Code. We will keep you informed of further

developments. Kathy D. Ireland Assistant General Counsel Attachment