
Introduction

The average American has a little over \$30,000 inside their Individual Retirement Accounts (IRA). Even though in most cases this is the second largest amount of wealth they have, behind their family home, few, if any of us have taken the time to find out exactly what we can or can not do with our IRA.

Sure, many of us have attended the “educational” workshops offered by financial advisors. While there is some great information offered at those classes, do they have time to tell you the whole story?

Next there is the wonderful resource of the internet, but there we run into the problem of believability. There can be some really outlandish suggestions posted on the web and most of us have no idea how to verify the information, much less the time to do so.

It is due to the lack of any “true” and complete reference in one simple to understand source about IRAs that we put this workbook together for people. Actually this book started with questions my mother asked me. After a long career as a teacher she had accumulated a substantial retirement portfolio. Like

quite a few of us, she was entranced with the stock market, only to see a large amount of her nest egg disappear after some reversals in the market.

After she had recovered from the shock, she asked if there was any law that said she had to invest her money in the stock market or mutual funds. She said it didn't really make any sense to have 100% of her retirement assets invested in large corporations where the individual investors really don't have any control over how their money is spent. Instead she said she would feel a lot better if she could invest her money in ways that she could control, and felt good about, investments such as rental real estate and the small businesses of friends and family members.

While at times my mother's ideas seem as outlandish as some of those on the internet, this question was voiced by more and more clients as time went on. Inevitably the questions would be asked by someone who had built up their business with their own sweat and blood, and just didn't feel comfortable giving their hard earned money to some faceless institution back east to manage for them. After all, they pointed out, something like 90% of mutual funds have under-performed the market. Most mutual funds don't even keep up with the stock market as a whole. A lot of these self made people just didn't understand the concept of paying the mutual fund fees, to help them lose money. They wanted to make sure they had direct control over their investments.

Due to these concerns, we decided to research in depth the concept of IRAs and find out the exactly what we could and couldn't invest the IRA money in. The more we researched this subject, the more amazed we became at how much flexibility we really have with IRA investments! In many cases we found that a lot of people had "*broken*" the law, and accessed their IRA money early, without paying any taxes, including penalty taxes, and their actions had the full blissing of the government!

And that is what this manual represents, at its most simplistic this is a manual for what you can and cannot do with your IRA money. But we do not stop there, when you talk with one of our consultants, we will also show you real life examples of what others have done to get the most mileage out of their plans, and how you can too.

In fact, don't be surprised if initially your current tax or financial advisor tells you that these actions are not allowed under the tax code. Due to this lack of knowledge on the subject, we are happy to provide all current *Internal Revenue Code* and *Substantial Authority* references to your professional advisor upon your request.

Rules of the Road

Prohibited Investments

So what is the truth about investments inside your IRA?

What is, and what is not allowed? Amazingly enough, there are really only two limitations upon what type of investments you can make inside your IRA.

The first limitation is you **CAN NOT invest any portion of your IRA money in LIFE INSURANCE contracts**. So if you wanted to use pre-tax dollars to invest in a life insurance policy, you could not use your IRA money to do so.

The other investment limitation is that you **CAN NOT use your IRA to purchase COLLECTIBLES**. If you do purchase a collectible inside your IRA, that amount of money spent on the collectible will be treated as a distribution.

The obvious question here is what does the tax code consider a collectible? The code specifically mentions the following as collectibles:

Work of Art

Rug or Antique

Metal or Gem

Stamp or Coin

Alcoholic Beverage

Reference... IRC 408 (a)(3), 408 (m)

There you have it. These are the only two limitations imposed by law upon the investments of your IRA. While it may be a nice feeling knowing that the law is on your side the next time that you want to make an investment in something not allowed by the current custodian of your IRA, there is still a practical problem. How to make those investments? While you could use a “self-directed” custodian for these types of investments, we believe that our IRA Recovery process is a much better way as you receive both checkbook control over your IRA money, as well as very strong asset protection. To find out more, give us a call at 801-916-2600.

Prohibited Transactions

Just as there are certain investments that you cannot make with your IRA money, there are certain actions that you cannot take with your IRA. As a general rule, your IRA cannot engage in any transaction between the IRA and a related party. The specific transactions not allowed are as follows:

- a sale or exchange, or leasing, of property between a plan and a related party;
- lending of money between a plan and a related party;
- furnishing of goods, services, or facilities between a plan and a related party
- transfer to, or use by, a related party of the income or assets of a plan;

- act by a related party whereby he deals with the income or assets of a plan in his/her own interests or for his/her own account; or
- receipt of any benefit for his/her own personal account by any related party in connection with a transaction involving the income or assets of the plan.

As you can see, the list is pretty detailed and in essence says your IRA can't have any business dealings with related parties. However, don't be discouraged as this list is really only a trap for the unwary, we'll show you how you may be able to lawfully engage in the above transactions with no ill effects

However before we start talking about that, for our purposes, here are the parties who would be considered related parties:

- The IRA owner
- One who makes decisions for the plan
- A person providing services to the plan;
- An ancestor, spouse, descendant of the IRA owner, or spouse of any of the above
- A corporation, partnership, or trust or estate of which 50 percent or more of is owned by any of the above.
- An officer, director, a 10 percent or more shareholder, or a highly compensated employee (earning 10 percent or more of the yearly wages of an employer) of the above
- A partner of any of the above

In a nutshell, a related party is an ancestor, spouse, descendant, spouse of any of the above, and any business entity owned 50% or more by one of the above.

Interestingly enough left out of the definition of related party are, **brothers, sisters, “step” relations, nieces, and nephews.**

After all that, what is the penalty for engaging in a prohibited transaction? Under the rules, your IRA will be considered fully distributed at any time that your IRA engages in a prohibited transaction.

UPDATE

On December 31, 2003, the IRS Released Notice 2004-8. In this notice they state that any transaction between a Roth IRA and a related party will be considered an abusive transaction, and anyone engaging in such activity needs to register with the IRS.

So if your IRA had \$100,000 inside of it, and loaned that money to you, since that would be considered a prohibited transaction, the IRS would consider that IRA fully distributed and would charge you taxes on the value of

the IRA. A loan to an entity owned 50% or greater by you or a related party would be considered a prohibited transaction as well.

Alternatively, if your IRA loaned the \$100,000 to a friend, the transaction would not be considered a prohibited transaction as your friend is probably not considered related to you for purposes of this section of the tax code. Just as a loan to a corporation or partnership that they owned 50% or greater of, would probably not be considered a prohibited transaction. Taking this a step further, if you are in a long term relationship with someone, and you are not married, transactions between your significant other and your IRA would not be prohibited.

One interesting note is that the IRS will only consider the IRA that engages in the prohibited transaction as distributed. For the sake of example let's say you have two different IRAs, one with \$100,000 inside of it, and one with \$2,000 inside of it and you personally loan \$50,000 to the IRA with \$2,000. Since a loan between you and your IRA is considered a prohibited transaction, the IRS would consider your \$2,000 IRA as fully distributed. Your IRA with \$100,000 would be left untouched and still have favorable tax status as it did not engage in the prohibited transaction.

As you can see there is a lot of wiggle room in these rules to structure some transactions that could be **beneficial to you**, without running afoul of the prohibited transaction rules.

Let me give you an example that I absolutely love.

Lets say that you are in your second marriage. While your first marriage was a complete disaster, you learned a lot from it, and now your second marriage has been both a long term and stable relationship. Along with the second marriage came some children whom you have grown to love and care about as if they were your very own. In fact, one of those children, a "**step**" child in the eyes of the IRS is now graduating from high school and you are trying to figure out how you are going to help her pay for her college expenses.

The solution? **A loan from your IRA!** Since your daughter is a “**step**” daughter, she is not considered related to you as per the prohibited transaction section of the tax code. So your IRA could loan her the money for her to go to college. Keep in mind that this will not be a distribution, which would mean a taxable event. Instead **it is a loan** that is considered an investment for the IRA and so no taxes will be due! You have just helped your daughter pay for her college in a totally TAX FREE transaction allowable by law!

Additionally, since this is a loan between your IRA and your daughter, interest is going to have to be paid back. Luckily for your daughter a recent change in the tax laws makes interest on education loans deductible in many situations. So your daughter may receive tax deductions on the interest she pays, even though the interest is going to flow into the IRA in a totally tax free manner. This may sound too good to be true, but the whole transaction is structured so it fits into the guidelines of the prohibited transaction rules.

Now lets say that your situation is a little bit different, you want to enter into a transaction that is listed as prohibited... now what?

Luckily for you, the following is a little known provision in the prohibited transaction rules, a provision used to **allow hundreds** of otherwise prohibited transactions:

“The Secretary shall establish an exemption procedure for purposes of this subsection.”

This provision goes on to say that the IRS shall coordinate the requests with the **Department of Labor**. In reality, all power to grant these exemptions has been shifted over to the Department of Labor.

Is it likely that your exemption will be granted? Yes it is.

While most tax advisors are not aware of this section, the Department of Labor grants hundreds of these exemptions each and every year. One giant size exemption is provision 96-62. This exemption is so amazing, I'm not going to try to tell you what it says, instead at the conclusion of this manual I've included a copy of the DOL's own web page describing this exemption. You will also find several pages of actual exemptions that have been granted to people just like you and me.

It is important to know that many others have already implemented the strategies discussed in this manual, in fact we've included close to 30 pages of exemptions granted in recent years.

What are some of the other Prohibited Transaction Exemptions that have been granted over the years?

1. The owner of the IRA was allowed to sell real estate to their IRA.

Remember the prohibited transaction for sales of assets between the IRA and the IRA owner? This is a direct violation of that, and yet was allowed by the DOL. Since it has been allowed more than twice in the last 5 years it meets the requirements of exemption 96-62.

2. The IRA owner was allowed to sell stock they owned to their IRA.
3. The IRA owner was allowed to purchase stock from their IRA.
4. The IRA owner was allowed to purchase real estate from their IRA.
5. **This is another incredible one!** This was an exemption that allowed an individual to have his retirement plan loan hundreds of thousand of dollars to his 100% owned corporation! Once again, the retirement plan loaned money to a corporation 100% owned by the business owner. This individual was now able to access all that money in a totally TAX FREE manner.

There were a couple of other very large benefits with this as well. The loan had to be paid back to the plan, which of course generates interest. Since the loan was presumably for business purposes the interest would be allowed as a deduction for income tax purposes!

Then we get to the **ASSET PROTECTION** aspect. As a requirement to granting the exemption, the DOL required that the pension plan have collateral for the loan. The owner then pledged their home and business assets as collateral for the loan. Just as with the prior exemption ruling, the individual now has absolutely fantastic asset protection. If somebody were to win a lawsuit against them, the lawsuit winner would be in second line behind the retirement plan for the ability to get the assets.

6. If you are a small business owner this exemption could save you thousands of dollars each year. In this blanket exemption, the DOL said that businesses that sell tangible property via extensions of credit, could have their retirement plans **factor the accounts receivables.**

So if the normal discount for selling off the accounts receivables early would be 10%, that would mean that the **business would report 10%**

less income each year. At the same time, that extra money would flow into the retirement plan in a totally TAX-FREE manner.

While this has been granted an exemption by the Department of Labor, on December 31, 2003, the IRS issued a notice saying that any transaction between a Roth IRA and a related party, or a business owned by a related party, will be considered a tax shelter, and participants will have to notify the IRS in their involvement in the transaction.

The above is certainly not an exhaustive list of all the exemptions granted, or of all the possible exemptions that could be granted. If you want to find out if your particular situation needs an exemption, or exemptions have already been granted, feel free to contact us at 801-916-2600, or visit our website to email us www.elitepensions.com

Setup

Knowing that you can make these transactions with your IRA is half the battle. The other half is placing your funds with a custodian who will allow you to make these transactions. The fact of the matter is that most IRA custodians are not aware of these exemptions either, so if you ask them to allow your IRA to purchase stocks from your personal account, they probably will not allow it. This is especially true with brokerage houses that serve as the custodian with your IRA.

The better solution is to transfer all the assets of your IRA to a “**true**” self directed custodian. This is usually a bank or trust company that serves as a custodian

who will follow your wishes and invest your retirement money in those investments you want to make, not investments that are going to earn the custodian a commission.

There is a very specific sequence of steps required to accomplish this correctly:

1. Establish an IRA account with the “**true**” self directed IRA custodian.
2. Request the current IRA custodian to transfer the assets to the self-directed IRA custodian.
3. Now the assets are in the “true” self directed IRA custodian’s account and ready for you to invest them in the manner you want.
4. Completed properly this is not a taxable event.

However, there are still some roadblocks to totally freeing up your money. Even though the money is inside the self-directed custodian, there could still be some problems. In particular the amount of paperwork that you will have to fill out for each transaction, as well as the cost of the custodian.

In order for you to use your money with the self directed custodian, you will have to call them and tell them what investment you want to make. The problem here is that this is going to require some paperwork. Of course when we talk about paperwork, there are two other aspects that come along with that, time and cost. So if you are going to be making a lot of loans or investments with your IRA money, just having the money inside the self directed IRA account may still not be the most efficient way to hold your IRA assets.

For more flexibility, simplicity, and asset protection, the better solution is to have your self directed IRA custodian create, and place all of the IRA assets i.e.

money, into a Limited Liability Company fully owned by the IRA.

A Limited Liability Company is a relatively new business entity that is a cross between a corporation and a partnership. The LLC gives the liability protection of a corporation, that is to say, even if you own all of the LLC, you will not be liable for the LLC's debts. At the same time, in most cases, the LLC will be taxed as a partnership. Partnership taxation is favorable as the LLC itself will not pay any taxes, rather, it will be the owner's of the LLC that pay the taxes. The owner's tax bill will be determined as if they were the ones who earned the money, not the LLC. So if the LLC earned \$100,000 in long-term capital gains for the year, and you owned 100% of the LLC, you would have a tax liability as if you had earned \$100,000 in long-term capital gains. In short, an LLC is a separate legal entity whose tax liability passes through to the owners of the LLC.

In this particular strategy, **the 100% owner of the LLC will be your IRA.** Therefore, no taxes are due unless you elect a distribution from the plan.

Asset Protection

It almost goes without saying that in recent years we have seen a dramatic increase in frivolous litigation. Even as I sit here typing this manual, I can hear television advertisements by attorneys trying to drum up further lawsuits. In

many cases due to the complexity of the laws Congress puts into place, people bring lawsuits with the expectation that the defendants will just settle, rather than having to pay the legal fees. In one recent case, a number of people sued a landlord for violations of the American's with Disabilities Act, even though the individuals had never even entered the property! California just passed a law allowing people to sue their co-workers for harassment. It is almost at the point where you can be sued just for looking at someone wrong.

While being sued is bad enough, what if you lose that lawsuit? **Is your IRA money protected?** The answer may surprise you. Some states say yes the IRA is exempt from the claims of your creditors, however many states only give limited protection. In particular, California, its law would allow a creditor to take away your IRA under certain circumstances, *"an IRA is **exempt** only to the extent necessary to provide for the support of the judgment debtor and his dependents when the judgment debtor retires, taking into account all resources that are likely to be available at the time of retirement "*

Does that give you peace of mind at night?

Then there is our old friend the IRS. I'm sure it comes as no surprise that they are allowed to take away your IRA if you run into problems as well. Not only are they allowed to, but they have actually been doing so recently. In one case, they even forced an individual to start taking distributions from his retirement plan, to

pay the back taxes he owed.

The solution? The Limited Liability Company again. Another unique aspect of a Limited Liability Company is the **asset protection** they give to the assets held inside the LLC. Under most state laws, if somebody were to sue the owner of an LLC, and the individual suing won the lawsuit, they could not take away the assets inside the LLC from the LLC owner. Rather the most they could get is a “*charging order*” against the LLC.

A charging order doesn't give the individual full rights over the LLC, actually their rights are very limited. In fact, you, the IRA owner could maintain control of the investments of the LLC, even though person who won the lawsuit had a charging order against all your ownership of the LLC. The most they would be entitled to would be the distributions from the LLC. If the LLC doesn't happen to make any distributions, then the individual who won the lawsuit isn't going to get anything.

Example: You own a long term investment LLC that holds \$100,000 in cash and securities. When you set up the LLC, your intention was to use it to build a nest egg for the future, so you are reinvesting all the profits it makes. To put it another way, you are not currently taking anything out of the LLC. Somebody rear ends you and decides to sue you. When the roulette wheel of justice stops, you come up a loser, a big loser and the other party is given a judgment against you for \$5,000,000.

Instead of being able to take over all your ownership of the LLC, and force liquidation, the winner only receives a “charging order” against your LLC. The charging order entitles them to any cash or assets that are distributed from the LLC. Since the purpose of the LLC was for long-term investments, no distributions are made, and thus the winner does not receive any cash or assets. Furthermore, you still make all the investment decisions regarding the assets owned by the LLC.

As you can see, with the protection of the charging order you can make sure that no one kills your golden goose for retirement. The most they will be entitled to would be the income generated by the LLC. Amazingly enough this would hold true for the IRS as well. In one recent legal memoranda for the IRS, one of their field agents asked IRS attorneys if they could force the liquidation and take all the assets of an LLC 100% owned by the individual the IRS was pursuing. The IRS’s attorneys wrote back saying that the agent had to respect the form of the entity and thus could not get at the assets owned by the LLC, the debts would have to be satisfied with a charging order against the LLC.

Setup of the LLC

The steps Elite will walk you through to open a truly self-directed IRA and place all the IRA assets into the LLC would be:

1. Open the “true” self directed IRA account.
2. Transfer all your IRA assets from your old account into the new account.
3. Once all the new assets are placed into the self directed account, a brand new LLC will be created for the IRA. (Be careful about what state you establish the LLC in, choosing the wrong state could cost you thousands – give us a call for guidance here)
4. Apply for an employer’s identification number with the IRS for the LLC.
5. Open a bank or brokerage account for the LLC. **Key point here**, if you are working with a financial advisor you really like, open the LLC account with that advisor!!! By opening the LLC account with the advisor, you can still benefit from their pearls of wisdom.
6. Direct the custodian to transfer the IRA’s assets into the LLC.

The end result is that all the assets of your IRA have been safely placed into the bank account of your Limited Liability Company. Now instead of having to call up your IRA custodian and asking their permission to make an investment all you have to do is to fill out a check, sign it, and rip it out of the checkbook.

A very important point to remember is that along with having on the spot access to your IRA funds comes the added responsibility of good stewardship. Research your investments wisely, after all this is YOUR retirement money. Properly managing your investments for both short and long term growth is the deciding factor between living in the house on the hill or the tool shed when you retire.

If you decide to have someone else assist you in restructuring your IRA to better meet your goals and dreams, we would like you to consider the dedicated staff here at Elite Pensions, LLC. We are focused on helping you properly implement the IRA strategies of your choice.

NOTES AND QUESTIONS

Frequently Asked Questions

Can I use my current broker with the “*IRA Recovery Strategy*”?

In most cases, your current brokerage house will not act as the custodian of your IRA if the IRA invests in non-publicly traded securities such as an LLC 100% owned by the IRA. That is why we use “**true**” self directed IRA custodians to hold title to the LLC. You will have to transfer your IRA funds from your current broker to the custodian. However, once the LLC is created, you will need a separate brokerage account for the LLC and it would only make sense to open that account with your financial advisor.

How can I trust the IRA custodian?

All of the custodians we use are registered trust companies. In order to register as a trust company they must meet stringent state requirements and have adequate reserves. If for any reason the custodian did go bankrupt that should not affect your money at all. Your money is kept in a separate account for your benefit that is not subject to the creditors of the custodian. Furthermore, the custodian never has control of your money, you are always in control. Once the LLC has been created, the custodian will then issue you a check made out in the name of the LLC, which you will deposit into the LLC bank account(s)

Can the LLC have more than 1 brokerage account?

Yes, the LLC can create as many brokerage and/or mutual fund accounts as you want. The accounts do not have to be with the same brokerage house.

I have a number of different IRA accounts with different brokers, can I transfer all of them to the custodian?

Yes, this is another of the benefits of the “*IRA Recovery Strategy*”. Consolidating all of your IRA accounts will make the management of your retirement assets so much easier. Instead of receiving many different account statements, you will only receive one.

Will I have to liquidate my portfolio?

Perhaps, currently the custodians that we work with prefer that only cash is contributed to the LLC. In other words, you may have to liquidate your mutual fund or stock positions to cash, and then transfer the cash to the custodian. After the LLC is created, you can then use the cash to go back and repurchase the investments you had before the transfer. However, each situation is unique, in many cases it has been possible to transfer control of the assets to the new custodian.

Can I do this with my SEP or a 403(b), tax sheltered annuity?

Yes, we can utilize this same structure for almost any retirement account. One limitation though is that unlike your TSA, you will not be able to borrow from the LLC.

How about 401(k) money?

If you control the 401(K) account you can implement the “*IRA Recovery Strategy*” with those funds. However, if you are an employee of a corporation that controls the 401(K) then you probably will not be able to implement this strategy until you leave the company or retire.

Are there any limits to my investments?

The “*IRA Recovery Strategy*” allows you to invest in any asset that a LLC can invest in. This can be a big benefit for people who would like to use their IRA money to invest in leaps and options, only to be told by the brokerage firm that IRAs can not invest in leaps and options. With the “*IRA Recovery Strategy*”, it is not the IRA investing in the money, rather it is the LLC. Remember though, any and all investments with the LLC must be made in the name of the LLC, and use the LLC’s taxpayer’s identification number. You can not make the investments in your name and have the LLC reimburse you. Additionally, if the LLC trades on margin any profits generated may generate taxable income even to your IRA. Call us to find out more information if you are going to trade on margin.

Who receives the LLC when I die?

Anytime you establish an IRA account, you must name a beneficiary for the account. Since the LLC is owned by your IRA, it will be passed on to the beneficiary (ies) of your IRA. Furthermore since this is a transfer of your IRA, this transfer avoids probate.

How long does this take?

The length of time needed really depends upon how long it takes to transfer your IRA from the brokerage account to the custodian. In many cases the brokerage firms will delay the transfer of funds as they hate to “lose” the money. Once the funds are transferred to the custodian, the custodian’s compliance department usually takes about 2 weeks to approve the investment in the LLC as administratively feasible.

What are the ongoing fees?

The ongoing fees you will incur are an annual fee from the custodian. These fees range from \$50/year to \$500 a year with some custodians even asking for a percentage of assets held by the IRA.

In addition to the custodian fees, you may have to file a tax return for the LLC. Depending upon the number of your transactions within the LLC, this might be as high as \$500, but that should be on the high end of the cost for the return. Finally there will be the state fees for maintaining the LLC as well.

Where can I get more information?

The concepts presented in this workshop have been written about in many different professional journals. In particular: *The Journal of Taxation*, the *Journal of New York CPAs*, and *Trusts and Estates magazine*. If your tax advisor says this cannot be done, you may want to refer him to one of these resources commonly used by tax attorneys, CPAs, and enrolled agents. Furthermore, recently the Department of Labor came out with a ruling specifically allowing an IRA to invest in a partnership of which the IRA’s owner and family were already partners. While the ruling establishes no legal precedent, it is insightful into the thinking of the IRS.



PWBA Office of Exemption Determinations

The Office of Exemption Determinations is headed by Director Ivan Strasfeld, who reports to the Deputy Assistant Secretary for Program Operations, Alan Lebowitz. The office administers the program for the granting of administrative exemptions from the prohibited transaction provisions of ERISA. The office has two divisions, one of which is responsible for class exemptions, and the other of which administers the program for individual exemptions.

ERISA prohibits certain specified transactions between employee benefit plans and entities defined to be "parties in interest". However, ERISA provides that the Department of Labor has the authority to grant exemptions from the prohibited transaction restrictions if an applicant can demonstrate that a transaction is administratively feasible, in the interests of the plan and its participants and beneficiaries, and protective of the rights of the participants and beneficiaries of the plan. The office reviews applications for such exemptions and determines whether or not to grant relief. Individual exemptions relate to a particular plan or applicant; class exemptions are applicable to anyone engaging in the described transactions, provided the enumerated conditions are satisfied.

Pursuant to class exemption PTE 96-62 ("EXPRO"), the office can also authorize individual transactions which would be otherwise prohibited in as little as 78 days. Under PTE 96-62, the applicant must demonstrate that the subject transaction is substantially similar to two or more individual exemptions granted within the previous five years.

The procedure for filing a prohibited transaction exemption request may be found at 29 CFR sections. 2570.30..2570.52 (See also Exemption Procedure Information Booklet).



PWBA Office of Exemption Determinations

Updated May 2001

FA # and Case ID	Name of Applicant	Description of Transaction	Substantially Similar Transactions
97-01E E00005	Morrison Knudson Corp.	Issuance of Stock Warrants by Plan Sponsor to Plan	PTE 96-19 (Rose's Stores) 61 FR 11875 (Mar.22,

	Participants	1996) PTE 96-46 (Jacor) 61 FR 31958 (June 21, 1996)
97-02E E00001	Ironwood Capital Sale of asset-backed securities by Party in Interest to Plans	PTE 94-84 (Brown & Sons) 59 FR 65400 (Dec. 19, 1994) PTE 96-22 (First Union) 61 FR 14827 (Apr. 3, 1996)
97-03E E00003	Deutsche Bank Sale of asset-backed securities by Party in Interest to Plans	PTE 94-84 (Brown & Sons) 59 FR 65400 (Dec. 19, 1994) PTE 96-22 (First Union) 61 FR 14827 (Apr. 3, 1996)
97-04E E00007	Arizona Machinery Co. Sale of Partnership Interest in Real Property by Plan to Plan Sponsor	PTE 96-06 (WLI Industries) 61 FR 3488 (Jan. 31, 1996) PTE 95-14 (Sammons) 60 FR 10877 (Feb. 28, 1995)
97-05E E00010	Kendall/Tyco Sale of GAC by Plan to Sponsor	PTE 95-07 (Lucky Electric) 60 FR 5732 (Jan. 30, 1995) PTE 96-72 (Mei Technology) 61 FR 49171 (Sept. 18, 1996)
97-06E E00008	Banc One & Affiliates Reinsurance of Insurance Policy by Affiliate of Sponsor	PTE 96-49 (First Security) 61 FR 31961 (June 21, 1996) PTE 91-66 (Agway) 56 FR 57678 (Nov. 13, 1991)
97-07E	Richard Bertelson PSP Sale of Real Property	PTE 96-43 (Mornell)

E00012		by Plan to Plan Participant	61 FR 25909 (May 23, 1996) PTE 96-33 (Gail Belt) 61 FR 20277 (May 6, 1996)
97-08E E00019	D. W. Associates Inc.	Sale of Real Property by Plan to Plan Trustees	PTE 96-43 (Mornell) 61 FR 25909 (May 23, 1996) PTE 96-33 (Gail Belt) 61 FR 20277 (May 6, 1996)
97-09E E00013	KeyCorp 401(k)	Sale of Mortgage Loans by Plan to Plan Sponsor	PTE 93-64 (Heritage Pullman) 58 FR 49325 (Sept. 22, 1993) PTE 96-15 (Life Insurance) 61 FR 10025 (Mar. 12, 1996)
97-10E E00015	Les Schwab PSP	Sale of Real Property by Plan to Plan Sponsor Affiliate	PTE 94-65 (Long Mftg.) 59 FR 45733 (Sept. 2, 1994) PTE 92-60 (Publix Super Market) 47 FR 38524 (Aug. 25, 1992)
97-11E E00016	Les Schwab PSP	Sale of Real Property by Plan to Plan Sponsor Affiliate	PTE 94-65 (Long Mftg.) 59 FR 45733 (Sept. 2, 1994) PTE 92-60 (Publix Super Market) 47 FR 38524 (Aug. 25, 1992)
97-12E E00017	Les Schwab PSP	Sale of Real Property by Plan to Plan Sponsor Affiliate	PTE 94-65 (Long Mftg.) 59 FR 45733 (Sept. 2, 1994) PTE 92-60 (Publix Super Market) 47 FR 38524 (Aug. 25, 1992)

97-13E E00018	Les Schwab PSP	Sale of Real Property by Plan to Plan Sponsor Affiliate	PTE 94-65 (Long Mftg.) 59 FR 45733 (Sept. 2, 1994) PTE 92-60 (Publix Super Market) 47 FR 38524 (Aug. 25, 1992)
97-14E E00020	Universal Forest Products	Sale of Real Property by Plan to Plan Sponsor	PTE 93-28 (Rectifier) 58 FR 25673 (May 14, 1993) PTE 95-82 (PMS Consolidated) 60 FR 47610 (Sept. 13, 1995)
97-15E E00023	Renco Properties Inc	Sale of Real Property by Plan to Parties in Interest	PTE 96-93 (Beall Corp PSP) 61 FR 68787 (Dec. 30, 1996) PTE 92-62 (Cappuccio) 57 FR 38525 (Aug. 25, 1992)
97-16E E00023	James Hardie Retirement PSP	Sale by Plan of Real Property	PTE 96-93 (Beall Corp PSP) 61 FR 68787 (Dec. 30, 1996) PTE 92-63 (Telephone Real Estate) 57 FR 38525 (Aug. 25, 1992)
97-17E E00027	El Rey of Hollywood Inc	Sale of Real Property by Plan to the Plan's Sponsor, and Certain Shareholders and Officers	PTE 94-14 (Randall Smith) 59 FR 4114 (Jan. 28, 1994) PTE 93-36 (Communication Wkrs) 58 FR 25670 (June 2, 1993)
97-18E E00028	Preco Inc.	Purchase of GAC by Sponsor from Plan	PTE 95-07 (Lucky Electric) 60 FR 5732 (Jan. 30, 1995) PTE 96-72 (Mei)

		Technology) 61 FR 49171 (Sept. 18, 1996)
97-19E E00029	Clark J. Winslow IRA Purchase of Real Property by Plan Participant from Plan	PTE 95-11 (Hosp. Supplies) 60 FR 8095 (Feb. 10, 1995) PTE 96-43 (Mornell) 61 FR 25909 (May 23, 1996)
97-20E E00031	Progress Software Corp. 401(k) Purchase of GAC by Sponsor from Plan	PTE 95-07 (Lucky Electric) 60 FR 5732 (Jan. 30, 1995) PTE 96-72 (Mei Technology) 61 FR 49171 (Sept. 18, 1996)
97-21E E00032	Credit Lyonnais Securities Sale of asset-backed securities from Party in Interest to Plan	PTE 94-84 (Brown & Sons) 59 FR 65400 (Dec. 19, 1994) PTE 96-22 (First Union) 61 FR 14827 (Apr. 3, 1996)
97-22E E00034	Da-Lite Purchase of Stock held by Plan by Participants/Fiduciaries	PTE 96-27 (Meisenbach) 61 FR 18159 (Apr. 24, 1996) PTE 95-80 (Shepard) 60 FR 46311 (Sept. 6, 1995)
97-23E E00033	K's Merchandise Purchase of Real Property from Plan by Plan Sponsor	PTE 94-48 (Laney/Duke) 59 FR 30048 (June 10, 1994) PTE 97-30 (Plumbers Local) 62 FR 31630 (June 10, 1997)
97-24E E00037	John R. Valaas, Sale of Stock held by Plan to Plan Participant	PTE 95-101 (Elkin) 60 FR 55868 (Nov. 3, 1995)

		PTE 93-15 (Suter) 58 FR 13095 (Mar. 9 , 1993)
97-25E E00038	Sarofim Lease of Real Property by Plan to Party in Interest	PTE 97-25 (Hughes) 62 FR 27621 (May 20, 1997) PTE 94-63 (AT&T) 59 FR 42311 (Aug. 17, 1994)
97-26E E00040	Gordon Food Service Sale of Mortgages by Plan to Plan Sponsor	PTE 96-15 (LSW) 61 FR 10025 (Mar. 12, 1996) PTE 93-35 (Hervey) 58 FR 31431 (June 2, 1993)
97-27E E00039	Bank One Loan to Plan by Party in Interest resulting from the liquidation of Plan's GIC	PTE 94-78 (Union Electric) 59 FR 56554 (Nov. 14, 1994) PTE 95-78 (Keycorp) 60 FR 46309 (Sept. 6, 1995)
97-28E E00035	A.O. Smith Retirement Sale of Real Property by Plan to Party in Interest	PTE 95-92 (Central Freight) 60 FR 49290 (Sept. 22, 1995) PTE 93-39 (Johnson Paints) 58 FR 34821 (June 29, 1993)
97-29E E00044	Malrite 401(k) Loan by Plan Sponsor to Plan	PTE 95-78 (Keycorp) 60 FR 46309 (Sept. 6, 1995) PTE 96-81 (Rexam) 61 FR 55325 (Oct. 25, 1996)
97-30E E00046	Lord Corp. Purchase of Plan's GIC's by Sponsor	PTE 95-07 (Lucky Electric) 60 FR 5732 (Jan. 30, 1995) PTE 96-72 (Mei)

		Technology) 61 FR 49171 (Sept. 18, 1996)
97-31E E00049	First National Bank Sale of Mortgages by Plan to Sponsor	PTE 93-23 (ELK) 58 FR 16714 (Mar. 30, 1993) PTE 93-64 (Heritage Pullman) 58 FR 49325 (Sept. 22, 1993)
97-32E E00050	First National Bank Sale of Mortgages by Plan to Sponsor	PTE 93-23 (ELK) 58 FR 16714 (Mar. 30, 1993) PTE 93-64 (Heritage Pullman) 58 FR 49325 (Sept. 22, 1993)
98-01E E00054	Hi-Plains Hospital Purchase of GAC's by Plan Sponsor	PTE 97-14 (Givens) 62 FR 7275 (Feb. 18, 1997) PTE 95-35 (Shipper's Paper) 60 FR 20776 (Apr. 27, 1995)
98-02E E00055	Intergroup Employees (FHS) Purchase of Partnership Interest from Plan by Party in Interest	PTE 96-16 (Legent) 61 FR 10025 (Mar. 12, 1996) PTE 97-21 (Orders Distr.) 62 FR 17207 (Apr. 9, 1997)
98-03E E00058	Horner Music Inc. Sale of Real Property by Plan to Plan Sponsor	PTE 95-11 (Hosp. Supplies) 60 FR 8095 (Feb. 10, 1995) PTE 95-36 (WalkerProd.) 60 FR 26740 (May 18, 1995)
98-04E E00063	Bay Cities Container Corp. Lease of Real Property by Plan to Plan	PTE 96-26 (Jack, Lyon & Jones PS) 61 FR 18159 (Apr. 24,

	Sponsor	1996) PTE 96-60 (Everett Clinic PS Plan) 61 FR 40004 (July 31, 1996)
98-05E E00060	Tommy J. Poirier PSP Sale of Real Property by Plan to Plan Sponsor	PTE 95-23 (Segal) 60 FR 13456 (Mar. 13, 1995) PTE 95-32 (Annis) 60 FR 18620 (Apr. 12, 1995)
98-06E E00061	Derrick & Assoc. AmeriPath Purchase of Partnership Interests from Plan by Party in Interest	PTE 95-23 (Segal) 60 FR 13456 (Mar. 13, 1995) PTE 96-79 (Huggler) 61 FR 54229 (Oct. 17, 1996)
98-07E E00062	Merrill Lynch Affiliates of the Lending Agent	Lending of Securities to PTE 97-63 (State Street) 62 FR 66689 (Dec. 19, 1997) PTE 96-14 (Morgan Stanley) 61 FR 10025 (Mar. 12, 1996) PTE 95-50 (Paloma) 60 FR 33003 (June 26, 1995)
98-08E E00064	ABN AMRO Inc. Sale of asset-backed securities from Party in Interest to Plan	PTE 97-05 (Southtrust) 62 FR 1925 (Jan. 14, 1997) PTE 97-28 (Norwest) 62 FR 27621 (May 20, 1997)
98-09E E00066	Lehman Brothers Inc. Securities Transactions described in PTE 75-1 and <u>PTE 81-6</u> between Plan and certain foreign broker-dealers	PTE 97-08 (Morgan Stanley) 62 FR 4810 (Jan. 31, 1997) PTE 97-57 (NatWest Sec.) 62 FR 56201 (Oct. 29, 1997)

98-10E Neuro Assoc. E00068	Sale of Real Property by Plan to Party in Interest	PTE 95-82 (PMS) 60 FR 47610 (Sept. 13, 1995) PTE 97-53 (McCroskey) 62 FR 51911 (Oct. 3, 1997)
98-11E Peter Cammalleri & E00072 AFC Partners	Plan loan from an individual account to a Party in Interest	PTE 97-19 (APA, Inc.) 62 FR 10085 (Mar. 5, 1997) PTE 93-76 (Hazlehurst & Assoc.) 58 FR 57841 (Oct. 27, 1993)
98-12E Ambrose J. E00070 Muenchrath	Purchase of three parcels of unimproved real property held by the plan by a Party in Interest	PTE 95-91 (Leavitt Group PSP) 60 FR 49290 (Sept. 22, 1995) PTE 94-74 (Stephen Cranston Prof.) 59 FR 51216 (Oct. 7, 1994)
98-13E Gilbert Gersenfish MD E00071	Sale of real improved property from the Plan to a Party in Interest	PTE 93-24 (Welborn Clinic) 58 FR 18426 (Apr. 9, 1993) PTE 96-60 (The Everett Clinic) 61 FR 40004 (July 31, 1996)
98-14E Les Schwab PS Ret. E00073 Trust	Sale of a parcel of qualifying employer real property from the Plan to a Party in Interest	PTE 96-51 (Puckett Machinery Co) 61 FR 36766 (July 12, 1996) PTE 96-37 (Budge Clinic) 61 FR 21501 (May 10, 1996) PTE 96-18 (H.E.B. Investment) 61 FR 11875 (Mar. 22, 1996)

98-15E Fina, Inc & the FINA E00080 Capital Accum. Plan	The holding or exercise by the Plans of certain warrants for the purchase of a stock of a Party in Interest	PTE 96-07 (Ventura County) 61 FR 3488 (Jan. 31, 1996) PTE 96-36 (Spreckels Industries) 61 FR 21501 (May 10, 1996)
98-16E The Rockford Pipe E00076 Trades Pension Plan	Sale of real property from the plan to a Party in Interest	PTE 96-71 (Normike Industries) 61 FR 49171 (Sept. 18, 1996) PTE 94-09 (Holsum Bakery) 59 FR 4115 (Jan. 28, 1994)
98-17E H.E.B. Investment E00077 Plan	Sale of improved real property from the Plan to a Party in Interest	PTE 96-18 (H.E.B. Investment) 61 FR 11875 (Mar. 22, 1996) PTE 97-30 (Joint Appr. Plumbers) 62 FR 31631 (June 10, 1997)
98-18E The David J. Joseph E00079 Co.	Sale by the Plan of an interest in a limited partnership to the plan sponsor	PTE 97-39 (Gart Brothers Sporting) 62 FR 41092 (July 31, 1997) PTE 97-29 (Washington National) 62 FR 31630 (June 10, 1997)
98-19E Francis J. Pizzi IRA E00086	Sale of unimproved real property between the Plan and a Party in Interest	PTE 98-03 (Robert A. Doneff) 63 FR 1980 (Jan. 13, 1998) PTE 96-24 (Biscayne Bay Pilots) 61 FR 18159 (Apr. 24, 1996) PTE 96-43 (Pierre W. Mornell MD)

		61 FR 25912 (May 23, 1996)
98-20E E00085	Sheils Obletz Johnsen Plan loan to a disqualified party	PTE 97-66 (PS Richard Wickerham) 62 FR 66691 (Dec. 19, 1997) PTE 97-62 (Franklin & Davis) 62 FR 62622 (Nov. 24, 1997)
98-21E E00084	Fernandez & Kalamaris MD Plan sponsor purchase of land trusts from plan	PTE 96-16 (LEGENT Ret. Plan) 61 FR 10034 (Mar. 12, 1996) PTE 95-57 (T.J. Lambrecht) 60 FR 359936 (July 12, 1995)
98-22E E00082	Commerzbank AG Securities Transactions described in PTE 75-1 and <u>PTE 81-6</u> between Plan and certain foreign broker-dealers	PTE 97-08 (Morgan Stanley) 62 FR 4811 (Jan. 31, 1997) PTE 97-57 (T.J. Lambrecht) 62 FR 56201 (July 12, 1995)
98-23E E00087	Drs. Ferguson & Lolley Surgery Assoc. Sale by Plan of Real Property	PTE 95-88 (Donald D Busker IRA) 60 FR 49011 (Sept. 21, 1995) PTE 95-11 (Hosp. Supplies) 60 FR 8095 (Feb. 10, 1995)
98-24E E00089	Capital One Bank Purchase by plan of asset-backed securities representing a pool of credit card receivables	PTE 98-13 (MBNA America Bank) 63 FR 10720 (Apr. 7, 1998) PTE 98-14 (Citibank) 63 FR 17027 (Apr. 7, 1998)

98-25E E00088	McMillan & Associates	Plan sponsor purchases unimproved property by the Plan	PTE 95-11 (Hospital Supplies) 60 FR 8095 (Feb. 10, 1995) PTE 94-14 (Randall W. Smith) 59 FR 4114 (Jan. 28, 1994)
98-26E E00090	Dr. Michael D. Hoffman PSP	Sale of improved real property by the plan to a Party in Interest	PTE 95-12 (Clarence E. Coker Jr) 60 FR 8095 (Feb. 10, 1995) PTE 94-66 (Thomas G. Soper MD) 59 FR 45733 (Sept. 2, 1994)
98-27E E00093	Downey Brand Seymour & Rohwer	Sale by the Plan of Limited Partnership interest to a Party in Interest	PTE 95-23 (Terry Segal P.C.) 60 FR 13456 (Mar. 13, 1995) PTE 95-32 (Annis, Mitchell, et al) 60 FR 18620 (Apr. 12, 1995)
98-28E E00106	J.W. Brewer Tire Co. Inc.	Sale of two mortgage notes by the Plan to a Party in Interest	PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997) PTE 96-15 (Life Insurance Corp) 61 FR 10025 (Mar. 12, 1996)
98-29E E00101	Downey Brand Seymour & Rohwer	Sale of a limited partnership interest by a Plan to a Party in Interest	PTE 95-23 (Terry Segal PC) 60 FR 13456 (Mar. 13, 1995) PTE 96-79 (Huggler & Silverang) 61 FR 54229 (Oct. 17, 1996)
98-30E	Downey Brand	Sale of a limited partnership interest by	PTE 95-23 (Terry Segal PC)

E00102	Seymour & Rohwer	a Plan to Parties in Interest	60 FR 13456 (Mar. 13, 1995) PTE 96-79 (Huggler & Silverang) 61 FR 54229 (Oct. 17, 1996)
98-31E E00103	Radiology Assoc. of Tampa Ret. Plan	Sale of unimproved real property by the Plan to Parties in Interest	PTE 95-12 (Clarence E. Coker Jr) 60 FR 8095 (Feb. 10, 1995) PTE 94-66 (Thomas G. Soper MD) 59 FR 45733 (Sept. 2, 1994)
99-01E E00104	Morgan Stanley & Co.	Lending of Securities to Affiliates of the Lending Agent	PTE 98-24 (Goldman Sachs) 63 FR 29435 (May 29, 1998) PTE 98-32 (Union Bk Switzerland) 63 FR 36958 (July 8, 1998)
99-02E E00107	South Texas Newborn Associates	Sale by Plan, individual accounts, of real property to a Party in Interest	PTE 96-78 (Zerhusen & Ghazi MD) 61 FR 54229 (Oct. 17, 1996) PTE 95-102 (Age-Based PS Plan) 60 FR 55868 (Nov. 3, 1995) PTE 93-79 (Robert W. McCurdy) 58 FR 60215 (Nov. 15, 1993) PTE 94-05 (David Rothman MD) 59 FR 2621 (Jan. 18, 1994) PTE 95-11 (Hospital Supplies Inc) 60 FR 8095 (Feb. 10, 1995) PTE 95-22 (Valley

		Transplants) 60 FR 13456 (Mar. 13, 1995) PTE 96-43 (Pierre W. Mornel MD) 61 FR 25909 (May 23, 1996)
99-03E E00110	Wisdom Import Sales Co. Sale of real estate investments by the Plan to a Party in Interest	PTE 94-48 (Laney & Duke) 59 FR 30048 (June 10, 1994) PTE 97-30 (Joint Appr. Plumbers) 62 FR 31630 (June 10, 1997) PTE 96-05 (J.H. Heafner Co) 61 FR 3478 (Jan. 31, 1996) PTE 97-39 (Gart Bros. Sporting) 62 FR 41088 (July 31, 1997) PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997) PTE 96-15 (Life Insurance Corp) 61 FR 10025 (Mar. 12, 1996)
99-04E E00111	Wisdom Import Sales Co. Sale of real estate investments by the Plan to a Party in Interest	PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997) PTE 96-15 (Life Insurance Corp) 61 FR 10025 (Mar. 12, 1996)
99-05E E00112	Wisdom Import Sales Co. Sale of real estate investments by the Plan to a Party in Interest	PTE 94-48 (Laney & Duke) 59 FR 30048 (June 10, 1994) PTE 97-30 (Joint Appr.

		Plumbers) 62 FR 31630 (June 10, 1997)
99-06E E00109	CARE Health Care Plan Plan lease of improved real property to a Party in Interest	PTE 98-18 (Consolidated Assoc.) 63 FR 19955 (Apr. 22, 1998) PTE 95-90 (Texas Commerce Bank) 60 FR 49289 (Sept. 22, 1995) PTE 95-75 (Construction Laborers) 60 FR 44905 (Aug. 29, 1995)
99-07E E00108	Hawkins Chemical Inc. Plan sells annuity contracts to plan sponsor	PTE 94-46 (Alberici Companies) 59 FR 30048 (June 10, 1994) PTE 96-66 (Hach Company) 61 FR 44081 (Aug. 27, 1996)
99-08E E00114	H.B. "Bud" Hayden Jr. IRA Plan sells fee title in commercial real estate to a Party in Interest	PTE 98-29 (Knoxville Surgical) 63 FR 33727 (June 19, 1998) PTE 97-04 (Summit Sheet Metal) 62 FR 1925 (Jan. 14, 1997)
99-09E E00113	Hy-Vee Employees' PS & 401(k) Sale of improved real property by the Plan to a Party in Interest	PTE 94-65 (Long Mfg. N.C. Inc) 59 FR 45733 (Sept. 2, 1994) PTE 96-18 (H.E.B. Investment) 61 FR 11875 (Mar. 22, 1996)
99-10E E00115	First South Utility Construction Inc. Plan sells to a Party in Interest shares of a	PTE 96-25 (Zausner Foods Corp)

	limited partnership	61 FR 18159 (Apr. 24, 1996) PTE 97-26 (ADP Fluor Daniel) 62 FR 27621 (May 20, 1997)
99-11E E00116	Bank of America Purchase by plan of asset-backed securities representing a pool of credit card receivables	PTE 98-13 (MBNA America Bank) 63 FR 10720 (Apr. 7, 1998) PTE 98-14 (Citibank) 63 FR 17027 (Apr. 7, 1998) PTE 97-26 (ADP Fluor Daniel) 62 FR 27621 (May 20, 1997)
99-12E E00118	Family Orthopedic Assoc. 401(k) Sale of real property from an individual accounts in Plan to a Party in Interest	PTE 96-78 (Zerhusen & Ghazi MD) 61 FR 54229 (Oct. 17, 1996) PTE 94-14 (Randall W. Smith MD) 59 FR 4114 (Jan. 28, 1994)
99-13E E00120	Entec Polymers Inc. Sale of certain land trust by the Plan to the sponsor	PTE 96-06 (WLI Industries) 61 FR 3488 (Jan. 31, 1996) PTE 95-57 (T.J. Lambrecht) 60 FR 35936 (July 12, 1995)
99-14E E00123	Liberty National Life Insurance Sale by the Plan of certain residential mortgages to a Party in Interest	PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997) PTE 96-15 (Life Insurance Corp) 61 FR 10025 (Mar. 12, 1996)
99-15E	Tenco Tractor Inc. Sale of interest in	PTE 98-50 (John V. Vick)

E00122 PSP	promissory notes by plan to a Party in Interest	63 FR 56227 (Oct. 21, 1998) PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997)
99-16E Broyhill Furniture E00124 Industries Inc.	Plan sponsor purchases improved real property from the Plan	PTE 98-29 (Knoxville Surgical) 63 FR 33727 (June 19, 1998) PTE 94-65 (Long Mfg. Inc) 59 FR 45733 (Sept. 2, 1994)
99-17E Glaziers Local 1940 E00128 Pension Fund	Sale by the Plan to the Plan sponsor of improved real property	PTE 97-36 (Operating Engineers) 62 FR 41088 (July 31, 1997) PTE 97-30 (Joint Appr. Plumbers) 62 FR 31630 (June 10, 1997)
99-18E National Spinning Co. E00129 Inc 401(k)	Interest free loan from the employer to the Plan	PTE 99-19 (vonRoll isola Sav Plan) 64 FR 24423 (May 6, 1999) PTE 94-58 (Hollingsworth & Vose) 59 FR 38205 (July 27, 1994)
99-19E Owens Group LTD E00134	A Party in Interest purchases property from the Plan	PTE 97-30 (Joint Appr. Plumbers) 62 FR 31630 (June 10, 1997) PTE 96-18 (H.E.B. Investment) 61 FR 11875 (Mar. 22, 1996)
99-20E St. Andrews Corp. E00136 PSP	Sale of certain shares of stock by the Plan to a disqualified person	PTE 95-21 (Wadco, Inc) 60 FR 13455 (Mar. 13, 1995)

	with respect to the Plan	PTE 96-27 (IRA John Meisenbach) 61 FR 18159 (Apr. 24, 1996)
99-21E E00135	Merrill Lynch Pierce Fenner & Smith Inc	Securities Transactions described in PTE 75-1 and <u>PTE 81-6</u> between Plan and certain foreign broker-dealers
		PTE 99-04 (Salomon Smith Barney) 64 FR 4127 (Jan. 27, 1999) PTE 98-62 (Barclays Bank PLC) 61 FR 71307 (July 31, 1996)
99-22E E00137	Union Carbide Supplemental Life Ins. Plan	A reinsurance transaction by the Plan sponsor and a Party in Interest to provide life insurance benefits to participants in the Plan
		PTE 96-95 (Zions Bancorporation) 61 FR 68790 (Dec. 24, 1996) PTE 96-49 (First Security Group) 61 FR 31961 (June 21, 1996)
99-23E E00139	Ukrop's Super Markets	Sale by the Plan of certain limited partnership interests to the Plan sponsor
		PTE 97-29 (Washington National) 62 FR 31630 (June 10, 1997) PTE 96-10 (Intrenet) 61 FR 3488 (Jan. 31, 1996)
99-24E E00140	Gambone Brothers Construction Company	Sale by Plan of real property to a Party in Interest
		PTE 98-19 (Thornton, Hegg, Reif) 63 FR 19955 (Apr. 22, 1998) PTE 95-82 (PMS PSP) 60 FR 47610 (Sept. 13, 1995) PTE 96-71 (Normike Industries) 61 FR 49171 (Sept. 18, 1996) PTE 97-51 (H. Weiss & Co.) 62 FR 48672 (Sept. 16, 1997)

99-25E Old Kent Bank E00132	Provision of Services	PTE 97-47 (AmSouth Bk Alabama) 62 FR 47054 (Sept. 5, 1997) PTE 95-51 (Fst Nat'l Bk of Boston) 60 FR 33004 (June 26, 1995)
99-26E Halstead, Jones, E00138 Thomas & Hooks IRA	Purchase of shares of a closely-held bank holding company from IRAs by the owner of each IRA	PTE 97-45 (Ronald L. Chez IRA) 62 FR 47050 (Sept. 5, 1997) PTE 97-48 (Martin D. Ross IRA) 62 FR 47050 (Sept. 5, 1997) PTE 96-27 (IRA John Meisenbach) 61 FR 18159 (Apr. 24, 1996)
99-27E Bank One Corporation E00141	Purchase by plan of asset-backed securities representing a pool of credit card receivables	PTE 98-13 (MBNA America Bank) 63 FR 10720 (Apr. 7, 1998) PTE 98-14 (Citibank) 63 FR 17027 (Apr. 7, 1998)
99-28E Chase Manhattan E00145 Bank	Employer rebates to the Plan the investment advisory fee the employer receives as investment manager for the Plan(s)	PTE 97-16 (US Trust Co of NY) 62 FR 7275 (Mar. 5, 1997) PTE 95-51 (Fst Nat'l Bk of Boston) 60 FR 33004 (June 26, 1995)
99-29E Chapin Medical Co. E00149	Sale by the Plan of unimproved property to a Party in Interest	PTE 96-78 (Zerhusen & Ghazi MD) 61 FR 54229 (Oct. 17, 1996) PTE 95-102 (Carolina OB-GYN) 60 FR 55868 (Nov. 3,

		1995)
99-30E E00154	Finch, Pitchell, Sims Jr., Strickland IRAs	Sale of shares of closely-held common stock by IRAs to disqualified persons
		PTE 99-06 (IRAs for Hummel, et al) 64 FR 4127 (Jan. 27, 1999) PTE 98-38 (IRAs Roark, Young) 63 FR 42079 (Aug. 6, 1998)
99-31E E00152	Ironwood Capital LTD	Sale of asset-backed securities from Party in Interest to Plan
		PTE 98-08 (PNC Capital Markets) 63 FR 8497 (Feb. 19, 1998) PTE 99-11 (Mellon Financial) 64 FR 11045 (Mar. 8, 1999)
99-32E E00155	Cardiovascular Surgery Assoc. PSP	401(k) Sale of unimproved real property by the Plan to a Party in Interest
		PTE 96-78 (Zerhusen & Ghazi MD) 61 FR 54229 (Oct. 17, 1996) PTE 98-16 (Overland, Ordal et al) 63 FR 17020 (Apr. 7, 1998)
00-01E E00161	Whitley Memorial Hospital	Loan to the Plan by Plan Sponsor
		PTE 95-13 (Alucobond Tech.) 60 FR 8095 (Feb. 10, 1995) PTE 95-78 (KeyCorp) 60 FR 46309 (Sept. 6, 1995)
00-02E E00156	Unifirst Corp.PSP	Sale of Plan interest in a parcel of unimproved real property to the Plan sponsor
		PTE 96-93 (Beall Corporation) 61 FR 68787 (Dec. 30, 1996) PTE 98-37 (McClain's RV Inc) 63 FR 38853 (July 20, 1998)
00-03E	Kimley-Horn & Assoc.	Sale by Plan of Real
		PTE 98-37 (McClain's

E00158	Ret Savings	Property	RV 401(k) 63 FR 38853 (July 20, 1998) PTE 96-93 (Beall Corp PSP) 61 FR 68787 (Dec. 30, 1996)
00-04E E00159	Kimley-Horn & Assoc. Money Purchase	Sale by Plan of Real Property	PTE 98-37 (McClain's RV 401(k)) 63 FR 38853 (July 20, 1998) PTE 96-93 (Beall Corp PSP) 61 FR 68787 (Dec. 30, 1996)
00-05E E00162	Greenwood Trust Co.	Purchase by plan of asset-backed securities representing a pool of credit card receivables	PTE 98-13 (MBNA America Bank) 63 FR 10720 (Apr. 7, 1998) PTE 98-14 (Citibank) 63 FR 17027 (Apr. 7, 1998)
00-06E E00165	Miller & Solomon General Contractors	Sale by Plan of Employer Securities	PTE 96-29 (Floral Glass & Mirror) 61 FR 18159 (Apr. 24, 1996) PTE 96-27 (IRA John Meisenbach) 61 FR 18159 (Apr. 24, 1996)
00-07E E00166	Linker Marketing Co.	Sale by Plan of Real Property to a Party in Interest	PTE 96-43 (Pierre W. Mornell MD) 61 FR 25909 (May 23, 1996) PTE 98-15 (Massachusetts Mutual) 63 FR 17020 (Apr. 7, 1998)
00-08E E00163	Operating Engineers LU 17	Sale by Plan of Real Property to a Party in Interest	PTE 96-65 (Bill Ussery Motors) 61 FR 44081 (Aug. 27,

		1996) PTE 96-83 (Oper. Eng. LU 150) 61 FR 58231 (Nov. 13, 1996)
00-09E Penn Camera E00167 Exchange Inc.	Sale by Plan of Real Property to a Party in Interest	PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997) PTE 96-15 (Life Insurance Corp) 61 FR 10025 (Mar. 12, 1996)
00-10E Minkoff Co. E00168	Sale by Plan of 3rd party notes	PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997) PTE 96-15 (Life Insurance Corp) 61 FR 10025 (Mar. 12, 1996)
00-11E Carl Acebes Custodial E00173 IRA	Sale by Plan of Real Property	PTE 95-88 (Donald D Busker IRA) 60 FR 49011 (Sept. 21, 1995) PTE 96-78 (Zerhusen & Ghazi MD) 61 FR 54229 (Oct. 17, 1996)
00-12E Conradco Inc. E00174	Sale by the Plan of real property to a Party in Interest	PTE 96-78 (Zerhusen & Ghazi MD) 61 FR 54229 (Oct. 17, 1996) PTE 94-14 (Randall W. Smith MD) 59 FR 4114 (Jan. 28, 1994)
00-13E Singer Organization E00175 Inc. PSP	Sale by Plan of Real Property	PTE 99-35 (H.H. Borland Inc PSP) 64 FR 46422 (Aug. 25, 1999) PTE 99-38 (MICO Inc)

		64 FR 53736 (Oct. 4, 1999)
00-14E E00177	Plumbers Supply Co. Inc. Sale of the Plan's mortgage portfolio to a Party in Interest	PTE 97-65 (Valley Forge) 62 FR 66689 (Dec. 19, 1997) PTE 96-15 (Life Insurance Corp) 61 FR 10025 (Mar. 12, 1996)
00-15E E00176	NECA-IBEW LU 176 JATC Electrical Fund Sale by the Plan of real property to a Party in Interest	PTE 95-11 (Hospital Supplies) 60 FR 8095 (Feb. 10, 1995) PTE 94-14 (Randall W. Smith MD) 59 FR 4114 (Jan. 28, 1994)
00-16E E00178	Precision Machining Inc. Sale by Plan of Real Property	PTE 98-29 (Knoxville Surg Group) 63 FR 33731 (June 19, 1998) PTE 97-36 (Oper. Eng. LU 150) 62 FR 41092 (July 31, 1997)
00-17E E00179	Cal Sierra Disposal Inc. PSP Sale by the Plan of certain unimproved real property to a Party in Interest	PTE 98-30 (Jack Mayesh Florist) 63 FR 33727 (June 19, 1998) PTE 98-37 (McClain's RV 401(k)) 63 FR 38853 (July 20, 1998) PTE 99-18 (State Bankshares) 64 FR 24422 (May 6, 1999) PTE 2000-04 (TMI Systems) 65 FR 4854 (Feb. 1, 2000)

00-18E Credit Suisse First E00180 Boston	Lending of Securities to Affiliates of the Lending Agent	PTE 98-32 (Union Bk Switzerland) 63 FR 36958 (July 8, 1998) PTE 98-23 (Bankers Trust Co) 63 FR 29435 (May 29, 1998) PTE 99-50 (Bankers Trust Co) 65 FR 534 (Jan. 5, 2000)
00-19E American Express E00181	Purchase by plan of asset-backed securities representing a pool of credit card receivables	PTE 98-13 (MBNA America Bank) 63 FR 10720 (Apr. 7, 1998) PTE 98-14 (Citibank) 63 FR 17027 (Apr. 7, 1998)
00-20E J.P. Morgan E00183	Securities Transactions described in PTE 75-1 and <u>PTE 81-6</u> between Plan and certain foreign broker-dealers	PTE 98-62 (Barclays Bank) 63 FR 71307 (Dec. 24, 1998) PTE 99-04 (Salomon Smith Barney) 64 FR 4127 (Jan. 27, 1999)
00-21E Goldberg, Kohn, Bell, E00187 Black, Rosenbloom & Moritz IRA	Purchase by Plan of employer securities	PTE 96-05 (J.H. Heafner Co) 61 FR 3478 (Jan. 31, 1996) PTE 99-18 (State Bankshares) 64 FR 24422 (May 6, 1999)
00-22E Farmers & Merchants E00188 Bank of Long Beach PSP	Sale by Plan of 3rd party notes	PTE 96-15 (Life Insurance) 61 FR 10025 (Mar. 12, 1996) PTE 98-37 (McClain's RV 401(k)) 63 FR 38853 (July 20, 1998)

00-23E E00189	Alexander P. Golden III IRA	Sale by Plan of other securities	PTE 97-44 (1st Source Bank) 62 FR 47050 (Sept. 5, 1997) PTE 99-06 (IRAs for Hummel, et al) 64 FR 4127 (Jan. 27, 1999)
00-24E E00192	Doskocil Manufacturing Co. 401(k)	Sale by Plan of real property	PTE 98-37 (McClain's RV Inc) 63 FR 38854 (July 20, 1998) PTE 98-19 (Thornton Hegg et al) 63 FR 19960 (April 22, 1998)
00-25E E00190	Aldrich, Schulten, Holec & Smith Mds	Sale by Plan of Real Property	PTE 99-35 (H.H. Borland Inc PSP) 64 FR 46422 (Aug. 25, 1999) PTE 96-24 (Biscayne Bay Pilots) 61 FR 18159 (Apr. 24, 1996) PTE 96-78 (Zerhusen & Ghazi MD) 61 FR 54229 (Oct. 17, 1996) PTE 98-16 (Overland, Ordal et al) 63 FR 17020 (Apr. 7, 1998)
00-26E E00191	James Edgerton & Dennis E. Ver Mulm IRA	Sale by Plan of other securities	PTE 99-28 (Gaetano Lombardo) 64 FR 38481 (July 16, 1999) PTE 97-45 (Ronald L. Chez IRA) 62 FR 47050 (Sept. 5, 1997)
00-27E	Westdeutsche Landersbank	Sale by Plan of other	PTE 99-04 (Salomon Smith Barney)

E00186	Girozentrale	securities	64 FR 4127 (Jan. 27, 1999) PTE 98-62 (Barclays Bank PLC) 61 FR 71307 (July 31, 1996)
00-28E E00194	Deutsche Bank	Securities Transactions described in PTE 75-1 and <u>PTE 81-6</u> between Plan and certain foreign broker-dealers	PTE 99-04 (Salomon Smith Barney) 64 FR 4127 (Jan. 27, 1999) PTE 99-45 (Donaldson et al) 64 FR 61138 (Nov. 9, 1999)
00-29E E00195	DW Productions Inc. PSP	Sale by Plan of real property	PTE 99-35 (H.H. Borland Inc PSP) 64 FR 46422 (Aug. 25, 1999) PTE 98-05 (Robert Herzog PSP) 63 FR 03773 (Jan. 26, 1998)
00-30E E00196	Nomura Corporate Research & Asset Mgmt.	QPAM where Affiliate has been convicted of a felony	PTE 97-13 (GE Capital Investment) 62 FR 07278 (Feb. 18, 1997) PTE 97-10 (PanAgora Asset Mgt.) 62 FR 04813 (Jan. 31, 1997)
00-31E E00200	Ladowicz, Coatar, Roe, Westberg, Camino et al IRAs	Sale by Plan of other securities	PTE 99-05 (Brune Glowacki et al) 64 FR 04131 (Jan. 28, 1999) PTE 98-38 (IRAs Roark, Young) 63 FR 42079 (Aug. 6, 1998)
00-32E E00198	Adams Brothers Interiors Inc.	Sale by Plan of partnership interests	PTE 99-18 (State Bankshares Inc) 64 FR 24423 (May 6, 1997)

			PTE 97-39 (Gart Brothers Sporting) 62 FR 41093 (July 31, 1997)
00-33E E00201	Waste Management Pension Plan	Sale by Plan of partnership interests	PTE 00-04 (TMI System Design) 65 FR 04854 (Feb. 1, 2000) PTE 99-18 (State Bankshares) 64 FR 24423 (May 6, 1999)
01-01E E00205	Porpoise Productions LTD PSP & Trust	Sale by Plan of real property	PTE 00-20 (Taylor M. Cole IRA) 65 FR 25953 (May 4, 2000) PTE 98-05 (Robert Herzog PSP) 63 FR 03773 (Jan. 26, 1998)
01-02E E00206	Credit Suisse First Boston	QPAM where Affiliate has been convicted of a felony	PTE 97-10 (PanAgora Asset Mgmt) 62 FR 4813 (Jan. 31, 1997) PTE 97-13 (GE Capital Investment) 62 FR 7278 (Feb. 18, 1997)
01-03E E00207	Little Rock Diagnostic	Sale by Plan of real property	PTE 98-37 (McClain's RV Inc) 63 FR 38854 (July 20, 1998) PTE 00-23 (Bay Internists Inc) 65 FR 33377 (May 23, 2000)
01-04E E00210	NECA-IBEW LU 176 JATC	Sale by Plan of real property	PTE 97-30 (Plumbers LU 27) 62 FR 31631 (June 10, 1997) PTE 97-36 (Oper. Eng.

			LU 150) 62 FR 41092 (July 31, 1997)
01-05E E00211	Meaden Screw Products Co PS 401(k) Plan	Sale of shares of stock (one-time sale for cash) from the Plan to a Party in Interest	PTE 96-32 (Coin Acceptors Inc) 61 FR 20277 (May 6, 1996) PTE 98-39 (William M Hitchcock) 63 FR 42080 (August 6, 1998)
01-06E E00208	Plumbers' & Pipefitters' Welfare Fund	Purchase by Plan of real property from the Union in a one-time transaction for cash	PTE 98-12 (Hawaii Laborers') 63 FR 12843 (March 16, 1998) PTE 98-31 (Pipefitters LU 537) 63 FR 33731 (June 19, 1998)
01-07E E00216	John K. Worz IRA	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp	PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-08E E00217	Dwayne D. Porter IRA	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp	PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-09E E00218	William C. Napier IRA	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp	PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December

		16, 1998)
01-10E	Myrtice Smith Lester	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp
E00219	IRA	
		PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-11E	Henry G. Green III	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp
E00220	IRA	
		PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-12E	George F. Snell	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp
E00221	IRA	
		PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-13E	Charles Porter	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp
E00222	IRA	
		PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-14E	Harry J. Bell	Sale by holdings of common stock & warrants issued by a C Corp that is converting to an S Corp
E00223	IRA	
		PTE 98-38 (Roark, Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)

01-15E E00212	KeyCorp and Its Affiliates	Receipt of fees from mutual funds	PTE 97-47 (AmSouth Bk Alabama) 62 FR 47054 (September 5, 1997) PTE 98-49 (Harris Trust) 63 FR 56227 (October 21, 1998) PTE 00-66 (Allfirst Bank) 65 FR 80461 (December 21, 2000)
01-16E E00213	Jose F. Font MD PA Profit Sharing Plan and Trust	Sale of real estate by Plan to a party in interest	PTE 00-20 (Taylor M. Cole IRA) 65 FR 25953 (May 4, 2000) PTE 96-89 (John A. Colglazier) 61 FR 64766 (December 6, 1996)
01-17E E00214	Dow Chemical Co Emp. Paid & Dependent Life Ins. DORINCO Insurance Co.	Captive Reinsurance	PTE 96-95 (Zions Bancorporation) 61 FR 68790 (December 30, 1996) PTE 96-49 (First Security Group) 61 FR 31961 (June 21, 1996)
01-18E E00224	American Refrigeration Supplies Inc. 401(k) Profit Sharing Plan	Sale out by Plan of limited partnership interests	PTE 96-86 (Acme 401K) 61 FR 59467 (November 22, 1996) PTE 99-48 (Info. Systems) 64 FR 70748 (December 17, 1999)