

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 planners and stock brokers. While there is some good information offered at those classes, how much of it is correct, and do they tell you the whole story?

Next there is the wonderful resource of the internet, but once again 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 limit people to investing 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 "kid" 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.

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!. No stockbroker ever told us about these scenarios.

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.

One word of caution though, just as with the individual hiking on a steep mountain trail, one misstep could have disastrous results. Before you take any action on these concepts you need to consult with a tax professional who is **familiar with these strategies** and has helped individuals in this area before. In fact, don't be surprised if 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 will be happy to provide all current *Internal Revenue Code* and *Substantial Authority* references to your professional advisor upon receiving a written request from you.

Rules of the Road

Prohibited Investments

As said earlier, there is a lot of misinformation about how you can invest your IRA assets. Most of this misinformation is being spread by those who have the most to gain by your lack of knowledge: investment advisors.

In most job rankings and salary surveys you read, investment advisors, stock brokers, and financial planners are fairly high on the list. One of the reasons is that as the baby boomers age, these individuals have accumulated large amounts of money in their company retirement plans. When it comes time to retire, who do these people turn to for investment advice? More than likely an investment advisor, stock broker, and or financial planner. These individuals are more than happy to help the retiring boomer ensure that they have enough money for their retirement. The only problem is that in most cases, these advisors only inform the person about investment opportunities that the advisor makes money on. After all, when was the last time your stockbroker called you to tell you about a great rental property that went up for sale, or a great new business being put together by businessman with a proven track record? It just doesn't happen.

The investment houses spend billions of dollars each year advertising the investments that they have for sale. While they don't tell you that you can not invest elsewhere, they sure don't make that fact well known.

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.

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.

Let's 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 I.

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 913-268-2990, or visit our website to email us www.ideal-tax.com

One final word of caution, always seek the advice of a competent professional and ask them point blank:

- Are you versed in these IRA strategies,

- Have you helped others to implement them?

The sad fact is, most are not aware of either the exemptions available or the proper application of the strategies.

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 The Tax Academy. **We sell no investments**, instead we are focused only 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 with the IRA Recovery System. However, once the process is completed, you would be able to move your IRA money back to the investment advisor of your choice.

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.

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

If you are allowed to transfer the funds to an IRA then you can use this strategy. All you need to do is to rollover the funds to a regular IRA, and then you can implement the strategy.

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.

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. As a rough average, the time for full completion is about 5 to 6 weeks.

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 and CPAs. 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 government.



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	Morrison Knudson	Issuance of Stock	PTE 96-19 (Rose's

E00005	Corp.	Warrants by Plan Sponsor to Plan Participants	Stores) 61 FR 11875 (Mar.22, 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 E00012	Richard Bertelson PSP	Sale of Real Property by Plan to Plan Participant	PTE 96-43 (Mornell) 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	John R. Valaas,	Sale of Stock held by	PTE 95-101 (Elkin)

E00037		Plan to Plan Participant	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	Bay Cities Container	Lease of Real Property	PTE 96-26 (Jack, Lyon &

E00063	Corp.	by Plan to Plan Sponsor	Jones PS) 61 FR 18159 (Apr. 24, 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	Lending of Securities to Affiliates of the Lending Agent	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 E00068	Neuro Assoc. 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 E00072	Peter Cammalleri & 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 E00070	Ambrose J. 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 E00071	Gilbert Gersensfish MD 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 E00073	Les Schwab PS Ret. 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 E00080	Fina, Inc & the FINA 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 E00076	The Rockford Pipe 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 E00077	H.E.B. Investment 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 E00079	The David J. Joseph 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 E00086	Francis J. Pizzi IRA	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 Oblatz 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 E00102 Seymour & Rohwer	Sale of a limited partnership interest by a Plan to Parties 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)
98-31E Radiology Assoc. of E00103 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 Morgan Stanley & Co. E00104	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 South Texas Newborn E00107 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	Wisdom Import Sales	Sale of real estate investments by the Plan to a Party in Interest
E00110	Co.	
		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	Wisdom Import Sales	Sale of real estate investments by the Plan to a Party in Interest
E00111	Co.	
		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	Wisdom Import Sales	Sale of real estate investments by the
		PTE 94-48 (Laney & Duke)

E00112 Co.	Plan to a Party in Interest	59 FR 30048 (June 10, 1994) PTE 97-30 (Joint Appr. Plumbers) 62 FR 31630 (June 10, 1997)
99-06E CARE Health Care E00109 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 Hawkins Chemical Inc. E00108	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 H.B. "Bud" Hayden Jr. E00114 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 Hy-Vee Employees' E00113 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 First South Utility E00115 Construction Inc.	Plan sells to a Party in Interest shares of a limited partnership	PTE 96-25 (Zausner Foods Corp) 61 FR 18159 (Apr. 24, 1996) PTE 97-26 (ADP Fluor Daniel) 62 FR 27621 (May 20, 1997)
99-11E Bank of America E00116	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 Family Orthopedic E00118 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 Entec Polymers Inc. E00120	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 Liberty National Life E00123 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. E00122 PSP	Sale of interest in promissory notes by plan to a Party in Interest	PTE 98-50 (John V. Vick) 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.	Sale of certain shares	PTE 95-21 (Wadco, Inc)

E00136	PSP	of stock by the Plan to a disqualified person with respect to the Plan	60 FR 13455 (Mar. 13, 1995) PTE 96-27 (IRA John Meisenbach) 61 FR 18159 (Apr. 24, 1996)
99-21E	Merrill Lynch Pierce	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)
E00135	Fenner & Smith Inc		
99-22E	Union Carbide	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)
E00137	Supplemental Life Ins. Plan		
99-23E	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)
E00139			
99-24E	Gambone Brothers	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.)
E00140	Construction Company		

			62 FR 48672 (Sept. 16, 1997)
99-25E E00132	Old Kent Bank	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 E00138	Halstead, Jones, 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 E00141	Bank One Corporation	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 E00145	Chase Manhattan 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 E00149	Chapin Medical Co.	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.	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 E00158	Kimley-Horn & Assoc. Ret Savings	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)
00-04E 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	Operating Engineers	Sale by Plan of Real	PTE 96-65 (Bill Ussery

E00163 LU 17	Property to a Party in Interest	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	Lending of Securities to	PTE 98-32 (Union Bk
E00180	Boston	Affiliates of the Lending Agent	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	Purchase by plan of	PTE 98-13 (MBNA
E00181		asset-backed securities representing a pool of credit card receivables	America Bank) 63 FR 10720 (Apr. 7, 1998) PTE 98-14 (Citibank) 63 FR 17027 (Apr. 7, 1998)
00-20E	J.P. Morgan	Securities Transactions described in PTE 75-1 and <u>PTE 81-6</u> between 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)
E00183			
00-21E	Goldberg, Kohn, Bell,	Purchase by Plan of	PTE 96-05 (J.H. Heafner
E00187	Black, Rosenbloom & Moritz IRA	employer securities	Co) 61 FR 3478 (Jan. 31, 1996) PTE 99-18 (State Bankshares) 64 FR 24422 (May 6, 1999)
00-22E	Farmers & Merchants	Sale by Plan of 3rd	PTE 96-15 (Life
E00188	Bank of Long Beach PSP	party notes	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 E00186	Westdeutsche Landersbank Girozentrale	Sale by Plan of other securities	PTE 99-04 (Salomon Smith Barney) 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 Adams Brothers E00198 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 Waste Management E00201 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 Porpoise Productions E00205 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 Credit Suisse First E00206 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 Little Rock Diagnostic E00207	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 NECA-IBEW LU 176	Sale by Plan of real property	PTE 97-30 (Plumbers LU 27)

E00210	JATC	property	62 FR 31631 (June 10, 1997) PTE 97-36 (Oper. Eng. LU 150) 62 FR 41092 (July 31, 1997)
01-05E	Meaden Screw	Sale of shares of stock	PTE 96-32 (Coin
E00211	Products Co PS 401(k) Plan	(one-time sale for cash) from the Plan to a Party in Interest	Acceptors Inc) 61 FR 20277 (May 6, 1996) PTE 98-39 (William M Hitchcock) 63 FR 42080 (August 6, 1998)
01-06E	Plumbers' &	Purchase by Plan of	PTE 98-12 (Hawaii
E00208	Pipefitters' Welfare Fund	real property from the Union in a one-time transaction for cash	Laborers') 63 FR 12843 (March 16, 1998) PTE 98-31 (Pipefitters LU 537) 63 FR 33731 (June 19, 1998)
01-07E	John K. Worz IRA	Sale by holdings of	PTE 98-38 (Roark,
E00216		common stock & warrants issued by a C Corp that is converting to an S Corp	Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-08E	Dwayne D. Porter IRA	Sale by holdings of	PTE 98-38 (Roark,
E00217		common stock & warrants issued by a C Corp that is converting to an S Corp	Young et al) 63 FR 42079 (August 6, 1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-09E	William C. Napier IRA	Sale by holdings of	PTE 98-38 (Roark,
E00218		common stock & warrants issued by a C	Young et al) 63 FR 42079 (August 6,

	Corp that is converting to an S Corp	1998) PTE 98-59 (Albright, Hamre et al) 63 FR 69326 (December 16, 1998)
01-10E E00219	Myrtice Smith Lester 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)
01-11E E00220	Henry G. Green III 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)
01-12E E00221	George F. Snell 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)
01-13E E00222	Charles 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)
01-14E E00223	Harry J. Bell 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)
01-15E 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)