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VIA ELECTRONIC AND U.S. MAIL

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Re: Police and Fire Determination Letters

Dear Scott, Jim, Sherry and Allison:

We are very pleased to enclose the favorable determination letters issued by the Internal Revenue Service ("IRS") on October 21, 2009, for the Police Pension Fund Structure and the Firefighters Pension Fund Structure (together, the "Plans"). Copies of the determination letters are enclosed and should be maintained by the Department of Insurance. As we discussed, we also understand that a copy of the appropriate determination letter will be distributed by you to each Article 3 and Article 4 fund.

The IRS letters are contingent upon the adoption of the administrative regulations which were most recently submitted to the IRS on October 6, 2009. We understand that the promulgation process has begun. It is important that this process continue on the timeline we discussed.

A favorable determination letter contains the opinion of the IRS as to the qualification of a particular plan under Internal Revenue Code Section 401(a), as well as the status of the related trust under Code Section 501(a), based on the plan documents. The Plans are entitled to rely on the IRS's opinion until material facts change with respect to the Plans (e.g., significant changes in the plan document) or until the effective date of a change in law. Of course, the Plans must also conform in operation with the Plan documents, as amended by the new administrative regulations.

Scott J. Brandt
James N. McNamee
Sherry Lauterbach
Allison Barrett
October 26, 2009
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The favorable determination letter expires on January 31, 2014. Between February 1, 2013 and January 31, 2014, it will be necessary to file new determination letter requests for the Plans in order to obtain updated determination letters. While the Plans must operate in compliance with any changes in federal law, one of the advantages of having a current determination letter is that the Plans will have an extended time period to amend the plan documents to reflect such changes.

We have not yet received the Compliance Statements relating to the voluntary compliance program (VCP) requests which were submitted together with the determination letter requests. We anticipate that the Compliance Statements will be issued relatively soon. When received, we will review them to see if any additional action needs to be taken. Once the regulations have been finally adopted, we will need to provide a copy to the IRS to confirm implementation of the amendments.

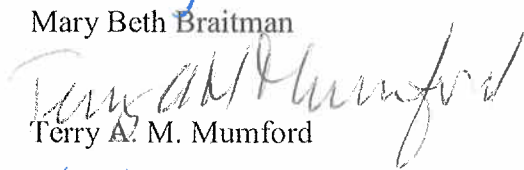
Please let us know if you have any questions or concerns. We are very pleased to have been able to assist in obtaining a quick, favorable result for the Plans.

Very truly yours,

ICE MILLER LLP

 Mary Beth Braitman /KMC

Mary Beth Braitman


Terry A. M. Mumford


Katrina M. Clingerman

TAMM/KMC/kwc
Enclosures

CIRCULAR 230 DISCLOSURE: Except to the extent that this advice concerns the qualification of any qualified plan, to ensure compliance with recently-enacted U.S. Treasury Department Regulations, we are now required to advise you that, unless otherwise expressly indicated, any federal tax advice contained in this communication, including any attachments, is not intended or written by us to be used, and cannot be used, by anyone for the purpose of avoiding federal tax penalties that may be imposed by the federal government or for promoting, marketing or recommending to another party any tax-related matters addressed herein.