

Wachovia Corporation  
One Wachovia Center  
301 South College Street, NC 0013  
Charlotte, NC 28288-0013

**Jane C. Sherburne**  
Senior Executive Vice President  
General Counsel & Secretary

Tel 704 715-2491  
Fax 704 374-6840  
jane.sherburne@wachovia.com



**WACHOVIA**

November 25, 2008

Honorable Charles Grassley, Ranking Member  
United States Senate  
Committee on Finance  
135 Hart Senate Office Building  
Washington, DC 20510-1501

Dear Senator Grassley:

I am responding to the November 18, 2008 letter you sent to Wachovia CEO, Robert K. Steel, requesting records relating to communications pertaining to the issuance of Notice 2008-83.

After a careful review we have confirmed that neither Mr. Steel nor anyone working under his direction or on behalf of Wachovia had any communications with Treasury on this matter or otherwise communicated a point of view to anyone on this provision before the ruling was released and thus we have no records reflecting such communications. In short, Wachovia had nothing to do with the IRS rule change about the treatment of deductions under section 382 of the Internal Revenue Code.

Please let us know if you have further questions.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Jane Sherburne'. The signature is fluid and cursive, with a long horizontal line extending to the right.

Jane Sherburne