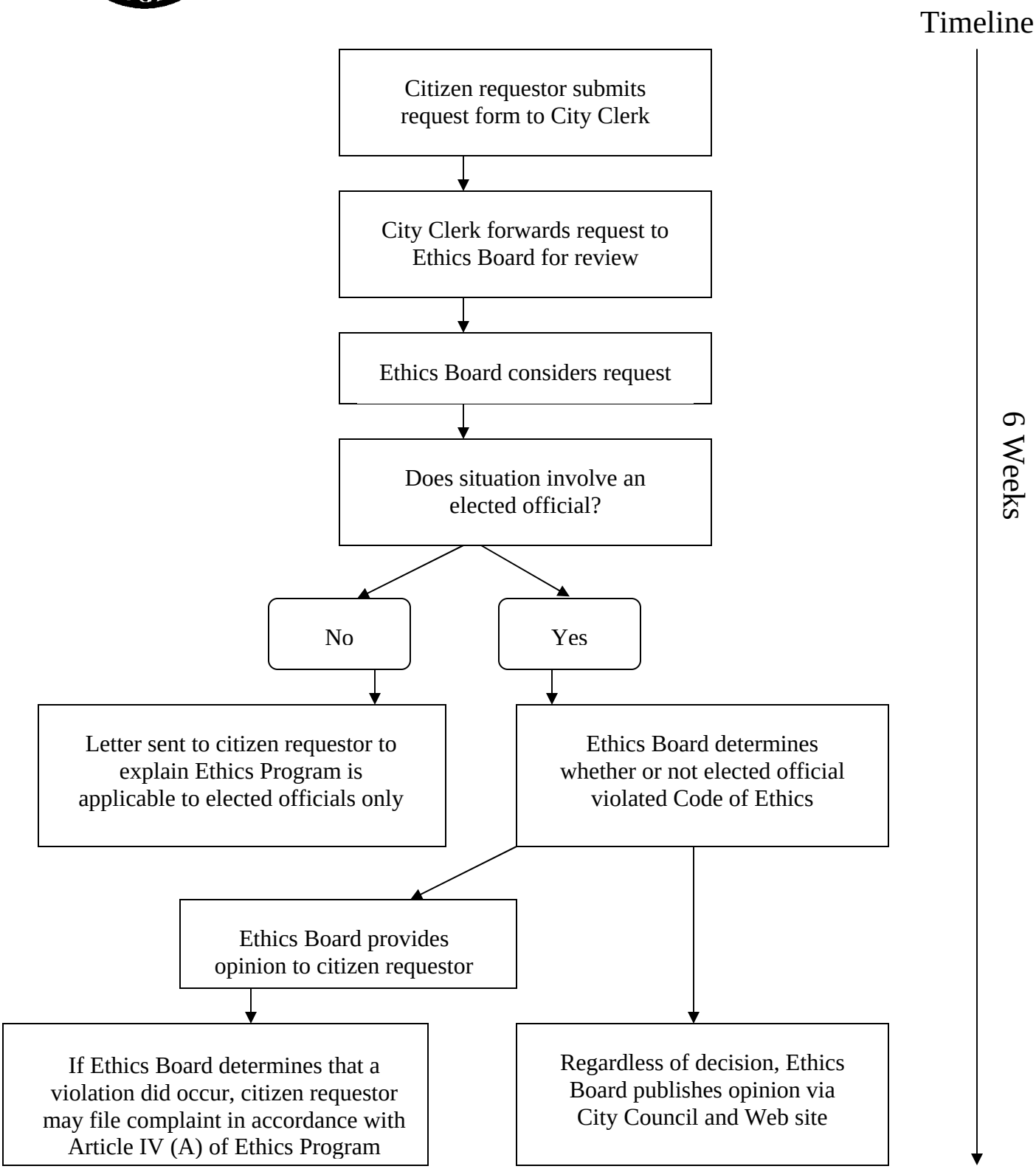
ETHICS PROGRAM
REQUEST FOR ADVISORY OPINION



10/22/2007