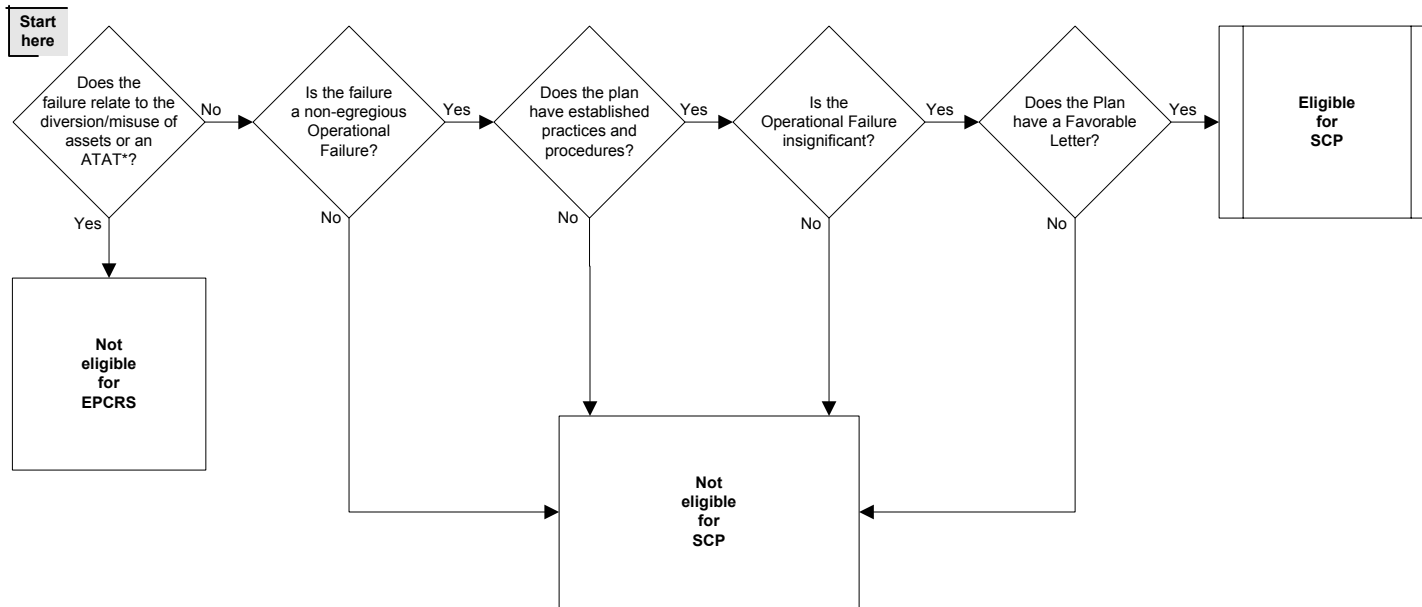


Chart 2

Eligibility for the Self-Correction Program ("SCP") - SEPs under Code section 408(k) and SIMPLE IRA Plans under Code section 408(p)



* In the event that the SIMPLE IRA, the SEP, or the plan sponsor has been a party to an Abusive Tax Avoidance Transaction (ATAT), SCP is not available to correct any Operational Failure that is directly or indirectly related to the ATAT.