



BOARD OF GOVERNORS  
OF THE  
**FEDERAL RESERVE SYSTEM**  
WASHINGTON, D. C. 20551

ADDRESS OFFICIAL CORRESPONDENCE  
TO THE BOARD

May 11, 1998

Mr. Brian L. King  
Senior Vice President  
Allied Irish Banks, p.l.c.  
First Maryland Building  
25 South Charles Street  
Baltimore, Maryland 21201

Dear Mr. King:

The Secretary of the Board of Governors of the Federal Reserve System, acting pursuant to authority delegated by the Board, and having considered the record of this notice in light of the relevant statutory factors, has approved the notice filed by Allied Irish Banks, p.l.c., Dublin, Ireland ("Allied Irish"), under section 4(j)(5)(B) of the Bank Holding Company Act ("BHC Act"), to engage de novo, through certain of its nonbanking subsidiaries ("Subsidiaries"), in serving as the general partner of private investment limited partnerships now existing or to be established in the future (the "Partnerships").

The Partnerships will invest only in those assets in which a bank holding company is permitted to invest. Subsidiaries, as general partners, will provide the Partnerships with certain administrative, recordkeeping, and investment advisory services. Allied Irish or the Subsidiaries will also privately place interests in the Partnerships. The Board previously has determined that the proposed activities are closely related to banking.<sup>1/</sup> Allied Irish has committed to conduct the proposed activities in accordance with the limitations contained in the

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<sup>1/</sup> See Dresdner Bank AG, 84 Federal Reserve Bulletin \_\_\_\_ (Order dated March 11, 1998); The Bessemer Group, 82 Federal Reserve Bulletin 569 (1996); Meridian Bancorp, Inc., 80 Federal Reserve Bulletin 736 (1994).

BHC Act, the Glass-Steagall Act, and in previous Board decisions, including that the Partnerships shall not issue interests more than four times per year unless the Board determines that more frequent issuances are consistent with the Glass-Steagall Act.<sup>2/</sup>

Allied Irish has certified that all the criteria set forth in section 4(j)(4) of the BHC Act are met and has filed the information required under that section. Based on all the facts of record, including relevant examination, financial, and other reports maintained by the Federal Reserve System, the System does not object to the consummation of the proposal at this time. In making this determination, the Secretary has relied on all the representations and commitments made by Allied Irish in connection with this proposal. The representations and commitments are conditions imposed in writing in connection with the findings and decision herein and, as such, may be enforced under the provisions of applicable law. As provided in section 4(j)(4)(C)(i) of the BHC Act, this determination is subject to all the restrictions, terms, and conditions imposed by the Board on investment advisory, private placement, and general partner activities of bank holding companies.

Approval of this notice is subject to the Board's authority to require reports by, and make examinations of, bank holding companies and their subsidiaries, and to require such modification or termination of activities of a bank holding company or any of its subsidiaries as the Board finds necessary to assure compliance with the BHC Act and the Board's regulations and orders issued thereunder.

The transaction should be consummated within three months after the date of this letter, unless such period is extended by the Federal Reserve Bank

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<sup>2/</sup> Allied Irish also has stated that the Partnerships will permit withdrawals by limited partners only on a quarterly basis.

of Richmond. Advice of the fact of consummation should be given in writing to the Reserve Bank.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jennifer J. Johnson", with a horizontal line extending to the right.

Jennifer J. Johnson  
Deputy Secretary of the Board

cc: Federal Reserve Bank of Richmond  
Department of Justice