

Request Area	Provisions covered	What it does	Specific Request
Request 1: Partner bank plus Confido IOLTA administration model	ELC 15.7(c), ELC 15.7(e)(1), and ELC 15.7(e)(2)	Authorizes the partner bank plus Confido structure for IOLTA administration, LFW benefit calculation, and remittance.	For purposes of the pilot, the partner bank plus Confido structure may satisfy the authorized-financial-institution framework in ELC 15.7(c), provided that client funds remain held at the partner bank and are not held by Confido. Confido may calculate the IOLTA benefit using the comparable-rate method described in ELC 15.7(e)(1)(ii), remit the resulting amount to LFW from the bank-paid deposit commission, and provide reporting substantially consistent with ELC 15.7(e)(2).
Request 2: Confido-supported overdraft and deficiency reporting	ELC 15.4(a) and ELC 15.4(b)	Combines overdraft notification agreement and report mechanics.	For purposes of the pilot, the partner bank may satisfy the overdraft-notification requirements of ELC 15.4(a) and (b) through Confido, acting as the approved fintech administrator. Confido may generate, transmit, or support overdraft and deficiency notices using partner-bank data, Confido ledger data, and platform controls, provided that each notice includes the information required by ELC 15.4(b) and is transmitted within the timeframe required by ELC 15.4(b)(2).

For purposes of the pilot, if Confido is approved as the fintech IOLTA administrator under the authorizing order and provisions of ELC 15.4 and 15.7, then Confido, acting as the approved administrator, may satisfy the overdraft-notification requirements of ELC 15.4(a) and (b) on behalf the partner bank.