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Mar. 02, 2012 LTR 2694C 0 R
84-1157699 201012 67
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KING WHEELER FUND INC
1370 GRANT ST
DENVER CO 80203

DECLARATION

013427

Under penalties of perjury, I declare that I have examined the return identified in this letter, including any accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct and complete. I understand that this declaration will become a permanent part of that return.

John S Russell

Signature of officer or trustee

March 4, 2012

Date

Manager

Title