

MIKE BEEBE
GOVERNOR

MICHAEL B. JOHNSON
COMMISSIONER



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ARKANSAS SECURITIES DEPARTMENT

August 9, 2007

Mr. John E. Pruniski
Hilburn, Calhoun, Harper, Pruniski & Calhoun, Ltd.
P.O. Box 5551
North Little Rock, AR 72119

RE: T.J. Raney & Sons, Inc.
No Action No. 07-90000356-NA006

Dear Mr. Pruniski:

We are in receipt of your letter dated May 18, 2007 in which you request that the staff of the Arkansas Securities Department recommend to the Commissioner that no enforcement action be taken against T.J. Raney & Sons, Inc. ("Raney") if it enters into certain rental arrangements with various Arkansas banks. Specifically, you state that it is Raney's intention to locate offices in various banks, and pay rent to those banks calculated upon a base rent amount plus a percentage rent based upon total revenues generated at the bank premises from securities transactions and investment adviser services, including services provided to or transactions with or on behalf of the bank or its portfolio.

You further indicate that Raney will make all appropriate disclosures necessary, as more fully set out in your letter, to ensure that its customers understand that Raney is a separate entity and not an affiliate of the bank, that products offered by Raney are not insured by the FDIC or other governmental authority, and that the bank may receive a portion of customer fees or commissions in the form of rent, as well as the disclosures required by 17 CFR § 275.206(4)-3.

Based upon the representations set forth in your letter, the staff will recommend to the Commissioner that no enforcement action be taken against Raney if it engages in the proposed activities as described herein.

Please note that the position expressed herein pertains only to the facts and circumstances described in your letter. Different facts might well result in a different response. This letter is not to be construed or relied upon as legal advice, nor does it purport to address the possible application of any other laws that may relate to the actions described in your letter.

Should you have any questions, please contact me.

Yours truly,

A handwritten signature in black ink, appearing to read "John E. Moore, Jr.", written over a horizontal line.

John E. Moore, Jr.
Chief Counsel