

**STATE OF ARKANSAS**  
**SECURITIES DEPARTMENT**

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IN THE MATTER OF

ORDER PROVIDING A  
TRANSACTIONAL EXEMPTION  
FROM REGISTRATION

COMMUNITY FIRST TRUST

COMPANY

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ORDER NO. 98-019-S

**FINDINGS OF FACT**

1. In a letter dated March 20, 1998, the Arkansas Securities Commissioner received a request involving the organization of a public trust company by the name of Community First Trust Company (the "Trust Company") pursuant to the "Arkansas Trust Institutions Act", Ark. Code Ann. § 23-51-101 et seq., which will be regulated by the Arkansas State Bank Department (the "Transaction"). Seven or less people will organize the Trust Company through the purchase of stock and/or debt obligations issued by the Trust Company. Each organizer will purchase with investment intent, will have access to information regarding the Trust Company, no commission or other remuneration will be paid in connection with the organization and there will be no public advertising relating to the investment by the organizers.
2. An exemption from registration is being requested pursuant to the Commissioner's discretionary authority under Ark. Code Ann. § 23-42-504(a)(12).

**CONCLUSIONS OF LAW**

3. Under § 23-42-504 (a) (12) of the Act, the Commissioner may by order exempt certain transactions from SS23-42-501 and 23-42-502 of the Act as not being necessary or appropriate in the public interest for the protection of investors.
4. It is not necessary or appropriate in the public interest for the protection of investors for the parties to be required to register the securities relating to the Transaction under the Act.
5. It is not necessary or appropriate in the public interest for the protection of investors for the parties to have been required to engage the services of a registered agent for the purpose of making offer and sales of the securities involved in the Transaction.

**OPINION**

6. Based on the foregoing, it appears registration of the securities relating to the Transaction is unnecessary in this instance.
7. This Order does not exempt the parties from the antifraud provisions of the Act.

**ORDER**

IT IS THEREFORE ORDERED that any securities offered or sold in connection with the Transaction, if offered and sold in compliance with the representations made in the letter of March 20,

1998 and in accordance with the Findings of Fact stated herein, shall be exempted from the §§ 23-42-501 and 23-42-502 of the Act.

WITNESS MY HAND AND SEAL this 24th day of March 1998.

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MAC DODSON

SECURITIES COMMISSIONER