

STATE OF MAINE  
OFFICE OF SECURITIES  
121 STATE HOUSE STATION  
AUGUSTA, ME 04333

IN RE:

Commonwealth Church Finance, Inc.

CONSENT AGREEMENT

No. 05-090-CAG

This agreement is entered into between the State of Maine Office of Securities (“Office of Securities”) and Commonwealth Church Finance, Inc., (“Commonwealth”) (CRD # 11768) a Georgia corporation with its principal place of business at 677 Jonesboro Road, McDonough, GA 30253.

**WHEREAS**, the parties agree as follows:

1. At all relevant times, it has been unlawful in Maine for a person to act as a broker-dealer unless licensed or exempt from licensing under Section 10301(1) of the Revised Maine Securities Act, 32 M.R.S.A. §§ 10101-10713;
2. At all relevant times, Commonwealth was a broker-dealer registered with the United States Securities and Exchange Commission and a member of NASD;
3. At all relevant times, Commonwealth was not licensed in Maine as a broker-dealer;
4. In a letter dated June 21, 2005, Commonwealth informed the Office of Securities, in response to a request for information, that it had effected three (3) transactions for the account of one Maine client while unlicensed;
5. It is the Office of Securities’ position that Commonwealth has acted as a broker-dealer in Maine without being licensed or exempt from licensing; and
6. Both parties desire an expeditious resolution of this matter.

**NOW, THEREFORE**, without trial or adjudication of any issue of fact or law, and without Commonwealth admitting or denying that its conduct violated the Revised Maine Securities Act, it is agreed that:

1. Commonwealth will comply with all licensing and other legal requirements governing persons acting as securities broker-dealers in the State of Maine at all times from the date hereof;
2. In lieu of the Office of Securities seeking the imposition of a penalty for the allegations contained herein, Commonwealth will pay the sum of \$5,810, to the Office of Securities upon Commonwealth's execution of this Agreement; and
3. The Office of Securities will not take further action against Commonwealth based upon the firm's unlicensed status during the period preceding and including the date of execution of this Agreement, PROVIDED, however, that this paragraph applies only to those transactions previously disclosed to the Office of Securities by Commonwealth.

August 3, 2005  
Date

s/Aaron D. Turner  
Aaron D. Turner  
President  
Commonwealth Church Finance, Inc.

August 15, 2005  
Date

s/Michael J. Colleran  
Michael J. Colleran  
Securities Administrator

Reviewed by:

August 15, 2005  
Date

s/Bonnie E. Russell  
Bonnie E. Russell  
Assistant Securities Administrator

Presented by:

August 15, 2005  
Date

s/Brian H. Dyer  
Brian H. Dyer  
Investigator/Examiner

