



9. Huntington has represented to the Office that the firm makes every effort to comply with federal and state regulations.
10. Both parties desire an expeditious resolution of this matter.

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

1. Huntington 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, Huntington will pay the sum of \$3,000 to the Office upon Huntington's execution of this Agreement; and
3. The Office of Securities will not take further action against Huntington, based upon its 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 by Huntington.

September 27, 2005  
Date

s/Robert J. Comfort, President  
Robert J. Comfort, President  
The Huntington Investment Company

October 4, 2005  
Date

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

Reviewed by:

October 3, 2005  
Date

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

Presented by:

October 3, 2005  
Date

s/Cathy J. Williams  
Cathy J. Williams  
Licensing Coordinator