

**ADMINISTRATIVE PROCEEDING  
BEFORE THE  
SECURITIES COMMISSIONER OF SOUTH CAROLINA**

**IN THE MATTER OF:** )  
 )  
**Conestoga Trust,** )  
 )  
\_\_\_\_\_ **Respondent.** )

**CONSENT ORDER**  
**File No. 15057**

**WHEREAS,** the Securities Division of the Office of the Attorney General of the State of South Carolina (the "Division"), after receiving information and pursuant to authority granted in the South Carolina Uniform Securities Act of 2005 (the "Act") S.C. Code Ann. § 35-1-101 et

seq. (Sept. 2010) initiated an investigation into certain activities of Conestoga Trust

2. The Agents effected at least eight (8) transactions in life settlement contracts during the Relevant Period.
3. The Agents received financial compensation from the Respondent for at least seven (7) of the Agents' transactions during the Relevant Period.
4. During the Relevant Period, the Agents were not registered to effect transactions in securities on behalf of the Respondent nor exempt from registration.

## II. CONCLUSIONS OF LAW

5. The South Carolina Uniform Securities Act of 2005, S.C. Code Ann. § 35-1-101, *et seq.*, governs the offer and sale of securities in this State.
6. ~~S.C. Code Ann. § 35-1-102(1) defines a "broker dealer" as a person engaged in the~~

business of effecting transactions in securities for the account of others or for the person's own account.

7. S.C. Code Ann. § 35-1-102(20) defines the term "person" to include, *inter alia*, an individual, a corporation, or any other legal entity.

~~S.C. Code Ann. § 35-1-102(20) defines "person" to include, *inter alia*, an "investment~~

QUESTIONS

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

