

COMMISSIONER OF BANKING

STATE OF WEST VIRGINIA

In the Matter of:

REQUEST FOR AUTHORIZATION TO
ENGAGE IN SUBSIDIARY BUSINESS BY
A SUPERVISED LENDER
filed on behalf of
ASSOCIATES CORP. OF NORTH AMERICA
(Re: Grocery home delivery program)

DECISION ON AUTHORIZATION REQUEST

On August 29, 1995 Associates Corp. of North America, by letter, requested of the West Virginia Commissioner of Banking a DECISION ON AUTHORIZATION pursuant to W. Va. Code § 46A-4-110 in regards to the marketing and selling of a grocery home delivery program in the same office, room, or place of business in which its supervised lender licensees conduct the business of making supervised loans.

Upon review of this request, the Commissioner of Banking has determined that such a product is insufficiently related to the business of transacting supervised loans; and that the nature and character of marketing, selling, and financing such an unrelated product might facilitate evasions or contradictions of Article 4, Chapter 46A of the West Virginia Code or the rules issued thereunder. This decision comports with a policy decision adopted in the fall of 1993 by this office to deny all further requests by supervised lender licensees to offer the sale of products and services unrelated to the extension of credit which more closely resemble the business of retail or wholesale trade through their offices in West Virginia.

46A-4-110

Based upon these determinations and findings the Commissioner of Banking IS OF THE OPINION that a supervised lender licensee may not conduct the business of making supervised loans in the same office, room, or place of business in which a grocery home delivery service plan is marketed and sold. THEREFORE THE REQUEST FOR AUTHORIZATION IS HEREBY DENIED.

SGB

Sharon G. Bias
Commissioner of Banking

Date: 3/20/96