

ARIZONA CORPORATION COMMISSION
SECURITIES DIVISION
THE CAPITOL
PHOENIX

April 5, 1954

Mr. Wm. H. Timbers
General Counsel
Securities and Exchange Commission
Washington 25, D.C.

Dear Mr. Timbers:

We are wondering if you have prepared and, if so, could make a copy available to us an index of citations by subject matter.

As you know the definitions in the Securities Act of Arizona follow in great detail those of the Securities Act of 1933; also the fraudulent practices section of our Act is identical with the Federal Act except as to the language relating to jurisdiction. In the absence of any precedent in our state courts prosecutors rely to a very great extent upon like federal cases. We have a copy of the government brief in U.S. v. the Penfield Corporation of California and find it extremely helpful.

Should you have a working manual or topical index to citations it would be of even further benefit to us.

We fully recognize that this is a rather impertinent request and will not feel offended in the least if you have such information available but do not deem it desirable to supply a copy.

Very truly yours,

Earl F. Hastings

EFH/h