S-265 Reg. P-17

## INTERPRETATION OF LAW OR REGULATION

(Copies to be sent to all Federal Reserve Banks)

May 15, 1941

Mr. , Vice President,	
Mr, Vice President, Federal Reserve Bank of,	
3	
Dear Mr:	
This refers to your letter of April 9, 1941, relating	
the holding company affiliate status of County Trust	Com-
pany,	
On November 7, 1935, County Trust Company wa	ıs de-
termined by the Board not to be engaged, directly or indirect	tly,
as a business in holding the stock of, or managing or control	Lling,
banks, banking associations, savings banks, or trust companie	∍s,
within the meaning of section 2(c) of the Banking Act of 1933	3. It
is the Board's view that such a determination with respect to	o an
organization continues in effect indefinitely in the absence	of a
contrary determination and that it governs the status of the	or-
ganization as a holding company affiliate not only of the bar	ıks
which were subsidiaries at the time of the determination but	also
of banks which become subsidiaries thereafter. While the Bos	ara
retains the right to make a new determination at any time upo	on the
basis of the then existing facts, there is no occasion for ac	
by the Board where, as in this case, there is no change in the	
facts such as would indicate that the organization in question	
might be deemed to be engaged, directly or indirectly, as a l	
iness in holding the stock of, or managing or controlling, be	ınks,
banking associations, savings banks, or trust companies.	•

Very truly yours,

(Signed) L. P. Bethea

L. P. Bethea, Assistant Secretary.