



ROBERT F. MILLIGAN
COMPTROLLER OF FLORIDA

OFFICE OF THE COMPTROLLER

DEPARTMENT OF BANKING AND FINANCE

STATE OF FLORIDA

TALLAHASSEE

32399-0350

May 20, 1999

Neil F. Garfield, Esquire
Attorney at Law
4119 North State Road Seven
Suite 245
Lauderdale Lakes, Florida 33319

P97000063484

Dear Mr. Garfield:

Re: "SMARTBanks Network, Inc."
"Sunshine MultiBank Automated Relationship Technologies, Inc."

Thank you for your recent letter/fax requesting approval for use of the above-referenced names.

It is the opinion of this Department that the above-referenced corporate names are definitive enough to differentiate the business being conducted from that of a commercial bank or trust company. Therefore, the Department does not object to your use of the above-referenced names being registered to conduct business in the state of Florida.

500002884365--9

Sincerely,

Art Simon - Director
Division of Banking
101 East Gaines Street
Fletcher Building - Sixth Floor
Tallahassee, FL 32399-0350
(850) 410-9111

:kr

cc: Karon Beyer, Chief
Bureau of Corporate Records
Division of Corporations
Secretary of State's Office

*Approval Letter for
name granted in 1997*
(108)

NEIL F. GARFIELD

Attorney at Law

MAILING ADDRESS: Suite 245, 4119 North State Road Seven
OFFICE ADDRESS: Suite 205, 9441 West Sample Road, Coral Springs, Florida 33065
Lauderdale Lakes, Florida 33319

800-552-9377 - 888-597-2833 (FAX) - Neilgarfield@msn.com

05/20/99

Ms. Kathy Ryan
Division of Banking
Director's office
101 E Gaines Street
Fletcher Building, 6th Floor
Tallahassee, Florida 32399-0350

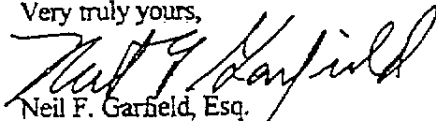
Re: Request for Approval: Name change of Haynes SMART Technologies, Inc. to SMARTBanks Alliance, Inc. and approval of Sunshine MultiBank Automated Relationship Technologies, Inc.

Dear Ms. Ryan:

Please be advised that the undersigned is the attorney for the above-referenced corporations seeking approval of a name change (Haynes SMART Technologies, Inc. to SMARTBanks Network, Inc.) and ratification of prior registration with the Secretary of State (Sunshine MultiBank Automated Relationship Technologies, Inc.) as set forth above. Your approval is required in that the word "banks" is included in the proposed names. This letter amends my last letter to you.

If there is anything further that you require for the approval of the above name change, please do not hesitate to contact the undersigned at your earliest convenience.

Very truly yours,



Neil F. Garfield, Esq.
General Counsel for Haynes SMART Technologies, Inc.
General Counsel for SMART

NEIL F. GARFIELD

Attorney at Law

MAILING ADDRESS: Suite 245, 4119 North State Road Seven
OFFICE ADDRESS: Suite 205, 9441 West Sample Road, Coral Springs, Florida 33065
Lauderdale Lakes, Florida 33319

800-552-9377 - 888-597-2833 (FAX) - Nearfield@m...

RECEIVED
DIRECTOR'S OFFICE
DIVISION OF BANKING
F/U _____ FILE _____

05/11/99

MAY 14 1999

Division of Banking
Director's office
101 E Gaines Street
Fletcher Building, 6th Floor
Tallahassee, Florida 32399-0350

RT: _____ CY: _____

Re: Request for Approval: Name change of Haynes SMART Technologies, Inc. to SMARTBanks.com, Inc.

Dear Sirs:

Please be advised that the undersigned is the attorney for the above- referenced corporation seeking approval of a name change as set forth above. Your approval is required in that the word "banks" is included in the proposed name.

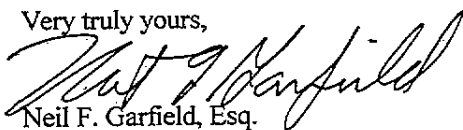
The corporation is the exclusive managing agent for a cooperative, to wit: Sunshine MultiBank Automated Relationship Technologies, Inc., d/b/a SMART and d/b/a SMARTBanks. The later entity already maintains web sites under the domain names SMARTBanks.com, SMARTBanks.org and SMARTBanks.net, the registered owner for which is Haynes SMART Technologies, Inc..

You have already approved Sunshine MultiBank Automated Relationship Technologies, Inc., as having "bank" in its name. This organization is a cooperative association of independent community banks. The entity does not directly perform banking functions, but provides services to banks through out Florida and the Southeast. Haynes SMART Technologies, Inc., also does business under the name SMARTBanks, as exclusive managing agent for the cooperative.

The Board of Directors of Haynes SMART Technologies, Inc., has recently voted to change the name to SMARTBanks.com, Inc. to reflect the increasing importance of internet communications to the SMART member banks and the functions of the cooperative and its agent.

If there is anything further that you require for the approval of the above name change, please do not hesitate to contact the undersigned at your earliest convenience.

Very truly yours,



Neil F. Garfield, Esq.
General Counsel for Haynes SMART Technologies, Inc.
General Counsel for SMART

NO REQUEST
RECEIVED
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