

FEDERAL DEPOSIT INSURANCE CORPORATION  
WASHINGTON, D.C.

_____	)	
In the Matter of	)	ORDER TO CEASE AND DESIST
	)	
	)	
COATESVILLE SAVINGS BANK	)	
COATESVILLE, PENNSYLVANIA	)	FDIC-09-447b
	)	
(Insured State Nonmember Bank)	)	
_____	)	

Coatesville Savings Bank, Coatesville, Pennsylvania (“Bank”), through its Board of Trustees (“Board”), having been advised of its right to the issuance and service of a NOTICE OF CHARGES AND OF HEARING detailing the unsafe or unsound banking practices and violations of law and/or regulation alleged to have been committed by the Bank and of its right to a hearing on the alleged charges under section 8(b)(1) of the Federal Deposit Insurance Act (“Act”), 12 U.S.C. § 1818(b)(1), and having waived those rights, entered into a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO CEASE AND DESIST (“CONSENT AGREEMENT”) with counsel for the Federal Deposit Insurance Corporation (“FDIC”) dated October 7, 2009, whereby, solely for the purpose of this proceeding and without admitting or denying the alleged charges of unsafe or unsound banking practices and violations of law and/or regulation, the Bank consented to the issuance of an ORDER TO CEASE AND DESIST (“ORDER”) by the FDIC.

The FDIC considered the matter and determined that it had reason to believe that the Bank had engaged in unsafe or unsound banking practices and violations of law and/or regulation. The FDIC, therefore, accepts the CONSENT AGREEMENT and issues the

following:

**ORDER TO CEASE AND DESIST**

**IT IS ORDERED**, that the Bank, its institution-affiliated parties, as that term is defined in section 3(u) of the Act, 12 U.S.C. § 1813(u), and its successors and assigns, cease and desist from the following unsafe or unsound banking practices and violations of law and/or regulation, as more fully set forth in the joint FDIC and Pennsylvania Department of Banking Report of Examination (“Report of Examination”) as of December 31, 2008 and the FDIC Compliance Report of Examination as of February 27, 2009 (“Compliance Examination Report”) :

1. Operating with management whose policies and practices are detrimental to the Bank.
2. Operating with a Board which has failed to provide adequate supervision and direction to the management of the Bank to prevent unsafe or unsound banking practices and violations of law and regulation.
3. Operating the Bank with inadequate internal routines and controls.
4. Operating the Bank in contravention of written loan policies and procedures.
5. Operating the Bank with inadequate earnings to fund growth and augment capital.
6. Operating the Bank with excessive level of interest rate risk.
7. Operating the Bank with inadequate net interest margins.
8. Operating the Bank with an inadequate level of capital protection for the kind and quality of assets held by the Bank.
9. Operating the Bank with inadequate liquidity and funds management policies and procedures.
10. Operating the Bank with a heavy reliance on non-core funding sources.
11. Failing to accurately reflect the condition of the Bank in Consolidated Reports of

Condition and Income.

12. Failing to develop and administer an effective Compliance Management System that ensures compliance with federal consumer protection laws, regulations, regulatory guidance and policies (“Consumer Laws”).
13. Failing to establish an effective process to monitor compliance with Consumer Laws.
14. Operating with ineffective compliance policies and procedures and an inadequate compliance audit program.
15. Operating in violation of applicable Consumer Laws and regulations as set forth in the Compliance Examination Report.
16. Operating in violation of Regulation O of the Board of Governors of the Federal Reserve System, 12 C.F.R. Part 215, and made applicable to insured State nonmember banks by section 18(j)(2), of the Act, 12 U.S.C. § 1828(j)(2), and section 337.3 of the FDIC Rules and Regulations, 12 C.F.R. § 337.3.

**IT IS FURTHER ORDERED**, that the Bank, its institution-affiliated parties, and its successors and assigns, take affirmative action as follows:

**MANAGEMENT**

1. (a) Within 45 days from the effective date of this ORDER, the Bank shall have and retain qualified management. At a minimum, such management shall include: a chief executive officer with proven ability in managing a bank of comparable size and experience in controlling interest rate risk, liquidity management and compliance with Consumer Laws; a new senior lending officer with an appropriate level of lending, collection, and loan supervision experience for the type and quality of the Bank’s loan portfolio; and a chief financial officer with demonstrated ability in all financial areas including, but not limited to, accounting, regulatory

reporting, budgeting and planning, management of the investment function, liquidity management and interest rate risk management. Management shall be provided the necessary written authority to implement the provisions of this ORDER. The qualifications of management shall be assessed on its ability to:

- (1) comply with the requirements of this ORDER;
- (2) operate the Bank in a safe and sound manner;
- (3) comply with applicable laws, rules, and regulations; and
- (4) restore all aspects of the Bank to a safe and sound condition,

including improving the Bank's management effectiveness, earnings, controlling interest rate risk, capital adequacy, and liquidity.

(b) While this ORDER is in effect, the Bank shall notify the Regional Director of the FDIC's New York Regional Office ("Regional Director") in writing of any changes of any member of the Board or senior executive officer within 15 days of the event. Any notification required by this subparagraph shall include a description of the background(s) and experience of any proposed replacement personnel and must be received at least 30 days prior to the individual(s) assuming the new position(s). For purposes of this ORDER, "senior executive officer" is defined in section 303.101(b) of the FDIC Rules and Regulations, 12 C.F.R. § 303.101(b). In addition, the Bank shall also establish procedures to ensure compliance with section 32 of the Act, 12 U.S.C. § 1831i, and Subpart F of Part 303 of the FDIC Rules and Regulations, 12 C.F.R. Part 303.

#### **MANAGEMENT – BOARD SUPERVISION**

2. Within 30 days from the effective date of this ORDER, the Board shall increase its participation in the affairs of the Bank by assuming full responsibility for the approval of the Bank's policies and objectives and for the supervision of the Bank's management, including all

the Bank's activities. The Board's participation shall include, at a minimum, monthly meetings in which the following areas shall be reviewed and approved by the Board: reports of income and expenses; new, overdue, renewed, insider, charged-off, delinquent, noncurrent, and recovered loans; investment activities; liquidity and funds management; operating policies; and individual committee actions. The Board minutes shall document these reviews and approvals, including the names of any dissenting directors.

### **INTERNAL ROUTINE AND CONTROL PROGRAM**

3. Within 45 days from the effective date of this ORDER, the Board shall adopt and implement an effective internal audit and control program for the safe and sound operation of the Bank. At a minimum, the program shall conform to the *Interagency Policy Statement on the Internal Audit Function and its Outsourcing* (FIL-21-2003, issued March 17, 2003) and provide procedures to test the validity and reliability of operating systems, procedural controls, and resulting records. In addition, the program shall provide for quarterly reports of audit findings from the internal auditor directly to the Board. The report and any comments made by a Board member regarding the internal auditor's report shall be noted in the minutes of the Board meeting.

### **INTEREST RATE RISK POLICY**

4. (a) Within 45 days from the effective date of this ORDER, the Bank shall develop and submit to the Regional Director, for review and comment, an interest rate risk policy and procedures that shall include, at a minimum:

(1) goals and strategies for reducing and managing the Bank's interest rate risk;

(2) measures designed to control the nature and amount of interest rate risk the Bank takes, including those that specify risk limits and defines lines of responsibilities

and authority for managing risk;

(3) a system for identifying and measuring interest rate risk, including a periodic calculation to measure interest rate risk exposure at various time horizons and establish target ratios;

(4) a system for monitoring and reporting risk exposures; and

(5) a system of internal controls, review, and audit to ensure the integrity of the overall risk management process.

(b) Within 30 days from the effective date of this ORDER, the Bank shall have an independent review of its interest rate risk conducted in accordance with the *Joint Agency Policy Statement on Interest Rate Risk* (FIL-52-96, issued July 12, 1996) and the *Supervisory Policy Statement on Investment Securities and End-user Derivative Activities* (FIL-45-98, issued April 28, 1998). Within 15 days of its receipt of the results of the independent review, the Bank shall submit the results to the Regional Director.

(c) The Bank shall submit the revised interest rate risk policy required by this paragraph to the Regional Director for review and comment. Within 30 days after the Regional Director has responded to the revised policy, the Board shall adopt the revised policy as amended or modified by the Regional Director. The revised policy shall be implemented immediately to the extent that the provisions of the revised policy are not already in effect at the Bank.

#### **CAPITAL MAINTENANCE**

5. (a) Within 120 days from the effective date of this ORDER, the Bank shall have a ratio of Tier 1 capital to total assets (“Tier 1 leverage ratio”) of not less than 6 percent and a ratio of qualifying total capital to risk-weighted assets (“Total Risk-Based Capital ratio”) of not less than 10 percent.

(b) Thereafter, in the event the Bank’s Tier 1 leverage ratio falls below 6

percent or its Total Risk-Based Capital ratio falls below 10 percent, the Bank shall immediately notify the Regional Director in writing and capital shall be increased in an amount sufficient to meet the minimum capital ratios required by subparagraph 5(a) within 30 days.

(c) The amount of capital needed to maintain the minimum capital ratios at the levels required in subparagraph 5(a) shall be in addition to a fully funded allowance for loan and lease losses, the adequacy of which shall be satisfactory to the Regional Director as determined at subsequent examinations and/or visitations.

(d) Within 60 days from the effective date of this ORDER, the Bank shall submit to the Regional Director a written capital plan. Such capital plan should address both internal and external sources of capital augmentation, including retention of earnings, asset sales, and restrictions of asset growth and shall detail the steps that the Bank shall take to achieve and maintain the capital requirements set forth in subparagraph 5(a) above. In developing the capital plan, the Bank shall consider, at a minimum:

- (1) the volume of the Bank's adversely classified assets;
- (2) the nature and level of the Bank's asset concentrations;
- (3) the adequacy of the Bank's allowance for loan and lease losses;
- (4) the anticipated level of retained earnings;
- (5) anticipated and contingent liquidity needs; and
- (6) the source and timing of additional funds to fulfill future capital needs.

(e) In addition, the capital plan shall include a contingency plan in the event that the Bank has (1) failed to maintain the minimum capital ratios required by subparagraph 5(a); (2) failed to submit a capital plan acceptable to the Regional Director as required by subparagraph 5(d); or (3) has failed to implement or adhere to a capital plan to which the

Regional Director has taken no written objection. Said contingency plan shall include a plan to merge the Bank with or the acquisition by another federally insured institution or holding company thereof. The Bank shall implement the contingency plan upon written notice from the Regional Director.

(f) The capital plan shall be submitted to the Regional Director for review and comment. Within 30 days of receipt of comment from the Regional Director, the Board shall revise the capital plan in accordance with the comments of the Regional Director, including any modifications or amendments requested by the Regional Director, and approve and implement the revised capital plan, which approval shall be recorded in the minutes of the corresponding Board meeting.

(g) No increase in capital necessary to meet the requirements of this ORDER may be accomplished through a deduction from the Bank's allowance for loan and lease losses or other reserve accounts.

(h) The Board shall review and update the capital plan on an annual basis, or more frequently if necessary. Copies of the reviews and updates shall be submitted to the Regional Director.

(i) In addition, the Bank shall comply with the FDIC's Statement of Policy on Risk-Based Capital found in Appendix A to Part 325 of the FDIC Rules and Regulations, 12 C.F.R. Part 325, App. A.

(j) For purposes of this ORDER, all terms relating to capital shall have the meanings ascribed to them and shall be calculated according to the methodology set forth in Part 325 of the FDIC Rules and Regulations, 12 C.F.R. Part 325.

#### **LOAN POLICIES AND PROCEDURES**

6. (a) Within 60 days from the effective date of this ORDER, the Bank shall

submit to the Regional Director revised written loan policies and procedures that have been approved by the Board, which shall, at a minimum, address the recommendations contained in Report of Examination, and include the following:

(1) documentation of lines of authority and operational responsibilities within the loan department;

(2) specific procedures shall be included for prior approval of loans to members of the Board and officers and their related interests in compliance with applicable laws and regulations;

(3) specific procedures regarding compliance with the *Interagency Policy Statement on the Allowance for Loan and Lease Losses* (FIL-105-2006, issued December 13, 2006) and the *Statement of Policy on Uniform Retail Credit Classification and Account Management Policy* (FIL-40-2000, issued June 29, 2000),

(4) provisions regarding identification of exceptions to the loan policy and requiring timely reports to the Board regarding such exceptions; and

(5) provisions regarding control and monitoring of the Bank's subprime and commercial real estate loan assets, including at least quarterly written reports to the Board regarding concentrations in subprime loans and commercial real estate.

(6) specific procedures for ensuring compliance with sections 215.4 and 215.5 of Regulation O of the Board of Governors of the Federal Reserve System, 12 C.F.R. §§ 215.4 and 215.5, and made applicable to insured state nonmember banks by section 18(j)(2), of the Act, 12 U.S.C. § 1828(j)(2), and section 337.3 of the FDIC Rules and Regulations, 12 C.F.R. § 337.3.

(b) The Board shall approve and adopt the revised loan policy mandated by this paragraph, which shall be recorded in the corresponding Board meeting.

## **BUDGET AND PROFIT PLAN**

7. (a) Within 60 days from the effective date of this ORDER, the Bank shall submit to the Regional Director for review and comment a written profit plan and a realistic, comprehensive budget for all categories of income and expense for the remainder of the year 2009 and calendar year 2010. The plan required by this paragraph shall contain formal goals and strategies, address executive officer compensation, be consistent with sound banking practices, reduce discretionary expenses, improve the Bank's overall earnings and net interest income, and shall contain a description of the operating assumptions that form the basis for major projected income and expense components.

The profit plan shall address, at a minimum, an analysis of the Bank's pricing structure and a recommendation for reducing the Bank's cost of funds.

(b) Within 45 days after the end of each calendar quarter following completion of the profit plan and budget required by this paragraph, the Board shall evaluate the Bank's actual performance in relation to the written profit plan and budget, record the results of the evaluation, and note any actions taken by the Bank in the Board minutes when such evaluation is undertaken.

(c) A written profit plan and budget shall be prepared for each calendar year for which this ORDER is in effect and shall be submitted to the Regional Director for review and comment within 30 days after the end of each calendar year. Within 30 days after receipt of all such comments from the Regional Director and after adoption of any recommended changes, the Bank shall approve the written profit plan and budget, which approval shall be recorded in the Board minutes. Thereafter, the Bank shall implement and follow the plan.

## **STRATEGIC PLAN**

8. (a) Within 90 days from the effective date of this ORDER, the Bank shall

develop and submit to the Regional Director for review and comment a comprehensive business/strategic plan (“Strategic Plan”) covering at least an operating period of three years. The Strategic Plan shall contain an assessment of the Bank’s current financial condition and market area, and a description of the operating assumptions that form the basis for major projected income and expense components.

(b) The Strategic Plan shall address, at a minimum:

(1) strategies for pricing policies and asset/liability management;

(2) specific plans for achieving and maintaining capital and shall detail the actions to be taken to maintain capital, including but not limited to, restrictions of asset growth, asset sales, or the merger with or acquisition by another federally insured institution or holding company thereof;

(3) plans for sustaining adequate liquidity, including back-up lines of credit to meet any unanticipated deposit withdrawals;

(4) financial goals, including pro forma statements for asset growth, capital adequacy, and earnings; and

(5) formulation of a mission statement and the development of a strategy to carry out that mission.

(c) The Bank shall submit the Strategic Plan to the Regional Director for review and comment. Within 30 days after the Regional Director has responded to the plan, the Board shall adopt the plan as amended or modified by the Regional Director, which approval shall be recorded in the minutes of the meeting of the Board. Thereafter, the Bank shall implement and follow the Strategic Plan.

(d) Within 45 days after the end of each calendar quarter following the effective date of this ORDER, the Board shall evaluate the Bank’s performance in relation to the

Strategic Plan and record the results of the evaluation, and any actions taken by the Bank, in the minutes of the meeting of the Board at which such evaluation is undertaken. A copy of the evaluation shall be submitted to the Regional Director.

(e) The Strategic Plan required by this ORDER shall be revised and submitted to the Regional Director for review and comment 45 days after the end of each calendar year for which this ORDER is in effect. Within 30 days after the Regional Director has responded to the plan, the Board shall adopt the plan as amended or modified by the Regional Director, which approval shall be recorded in the minutes of the meeting of the Board. Thereafter, the Bank shall implement the Strategic Plan.

#### **LIQUIDITY AND FUNDS MANAGEMENT**

9. (a) Within 60 days from the effective date of this ORDER, the Bank shall revise its liquidity and funds management policy and submit it to the Regional Director for review and comment. Annually thereafter, while this ORDER is in effect, the Bank shall review its policy for adequacy and, based upon such review, shall make necessary revisions to the policy to strengthen funds management procedures and maintain adequate provisions to meet the Bank's liquidity needs. The revised policy shall include, at a minimum, provisions:

- (1) establishing a reasonable range for its net non-core funding ratio as computed in the Uniform Bank Performance Report and shall address the means by which the Bank will seek to reduce its reliance on non-core funding and high cost rate-sensitive deposits;
- (2) identifying the source and use of borrowed and/or volatile funds;
- (3) establishing sufficient back-up lines of credit that would allow the Bank to borrow funds to meet depositor demands if the Bank's other provisions for liquidity proved to be inadequate;

(4) requiring the retention of securities and/or other identified categories of investments that can be liquidated within one day in amounts sufficient (as a percentage of the Bank's total assets) to ensure the maintenance of the Bank's liquidity posture at a level consistent with short and long-term liquidity objectives;

(5) establishing a minimum liquidity ratio and defining how the ratio is to be calculated;

(6) establishing contingency plans by identifying alternative courses of action designed to meet the Bank's liquidity needs; and

(7) addressing the use of borrowings (i.e., seasonal credit needs, match funding mortgage loans, etc.) and providing for reasonable maturities commensurate with the use of the borrowed funds; addressing concentration of funding sources; and addressing pricing and collateral requirements with specific allowable funding channels (i.e., brokered deposits, internet deposits, Fed funds purchased and other correspondent borrowings).

(b) Within 30 days after the Regional Director has responded to the revised policy, the Board shall adopt the revised policy as amended or modified by the Regional Director. The revised policy shall be implemented immediately to the extent that the provisions of the revised policy are not already in effect at the Bank.

### **BROKERED DEPOSITS**

10. (a) Beginning with the effective date of this ORDER, and so long as this ORDER is in effect, the Bank shall not solicit, accept, renew, or roll over any brokered deposits unless it has applied for and been granted a waiver by the Regional Director in accordance with the provisions of section 337.6 of the FDIC Rules and Regulations, 12 C.F.R. § 337.6.

(b) While this ORDER is in effect, the Bank shall comply with the interest rate restrictions on the effective yields on deposits described in section 337.6 of the FDIC Rules

and Regulations.

(c) Within 60 days from the effective date of this ORDER, the Board shall develop and submit to the Regional Director a plan to reduce the Bank's reliance on brokered and non-core deposits and wholesale funding sources to a level acceptable to the Regional Director.

### **COMPLIANCE MANAGEMENT SYSTEM**

11. (a) Within 60 days from the effective date of this ORDER, the Bank shall develop and implement an effective Compliance Management System ("CMS") that is commensurate with the level of complexity of the Bank's operations to ensure the establishment and implementation of a comprehensive written compliance program ("Compliance Program").

The CMS shall at a minimum include:

(1) a Compliance Program that shall embrace all of the Consumer Laws to which the Bank is subject and that is reviewed and approved annually by the Board, which approval shall be recorded in the minutes of the meeting of the Board;

(2) written policies, operating procedures and processes, and controls that ensure that the Bank's loan products and credit card lending activities comply with all applicable Consumer Laws and all implementing rules and regulations and ensure that they are periodically updated to reflect changes in the Bank's business and regulatory environment;

(3) designation of an appropriate Compliance Officer to oversee the CMS and Compliance Program, as well as an appropriate number of compliance personnel with sufficient experience in, and knowledge of, Consumer Laws and regulations to administer the CMS;

(4) implementation and maintenance of a training program related to Consumer Laws for employees having responsibilities that relate to applicable Consumer Laws,

including senior management and the Board, commensurate with their individual job functions and duties. The Compliance Officer shall be responsible for the administration of the Compliance Program, and shall provide training to officers and employees on a continuing basis;

(5) include effective compliance monitoring procedures that have been incorporated into the normal activities of every department. At a minimum, monitoring procedures should include ongoing reviews of:

- a. applicable departments and branches;
- b. disclosures and calculations for various loan and deposit products;
- c. document filing and retention procedures;
- d. marketing literature and advertising; and
- e. internal compliance communication system that provides appropriate Bank personnel updates resulting from revisions to Consumer Laws;

(6) require an annual independent, comprehensive written audit. The Board shall document its efforts, including the review of and corrective measures made pursuant to the audit's findings, in the minutes of the Bank's board of trustees. The audit shall at a minimum:

- a. provide for sufficient transactional testing, as appropriate, for all areas of significant compliance risk, including those areas identified in the Compliance Examination Report; and
- b. identify the deficiencies noted, provide descriptions of or suggestions for corrective actions and time frames for correction, and establish follow-up procedures to verify that corrective actions were implemented and effective.

## **COMPLIANCE OFFICER**

12. (a) Within 60 days from the effective date of this ORDER, the Bank shall have and retain a qualified Compliance Officer with the requisite knowledge and experience to establish and administer an effective CMS. The Board shall ensure that the Compliance Officer receives ongoing training, sufficient time, and adequate resources to effectively oversee, coordinate, and implement the CMS.

(b) The responsibilities of the Compliance Officer shall include:

(1) developing and reviewing compliance policies and procedures to ensure compliance with all applicable Consumer Laws and the Bank's Compliance Program;

(2) assessing emerging issues or potential liabilities and training management and employees in Consumer Laws;

(3) reporting compliance activities and audit or review findings to the Board and ensuring corrective actions; and

(4) coordinating responses to consumer complaints.

(c) The Board shall ensure that the Compliance Officer has and retains sufficient authority and independence to implement policies related to Consumer Laws and to institute corrective action as needed. At a minimum, this authority shall include the ability to cross departmental lines; access all areas of the Bank's operations; and effectuate corrective action.

## **HMDA COMPLIANCE**

13. Within 60 days from the effective date of this ORDER, the Bank shall adopt and implement systems and controls to ensure compliance with the Home Mortgage Disclosure Act, 12 U.S.C. §§ 2801-2810, and Regulation C of the Board of Governors of the Federal Reserve System ("Regulation C"), 12 C.F.R. Part 203, with specific provisions to accurately collect and

record required data on applications for, and originations, purchases, and refinancings of, home purchase and home improvement loans on a register in the format prescribed in Regulation C within 30 calendar days after the end of the quarter in which the final action is taken, as required by section 203.4(a) of Regulation C, 12 C.F.R. § 203.4(a).

### **MANAGING THIRD-PARTY RISK**

14. Within 60 days from the effective date of this ORDER, the Bank shall adopt and implement systems and controls to ensure proper management of third-party risk. The Bank's third-party risk management program should address (1) risk assessment, (2) due diligence in selecting third-party vendors and service providers, (3) contract structuring and review, and (4) effective oversight of vendors and service providers.

### **AMENDED CALL REPORTS**

15. Within 30 days from the effective date of this ORDER, the Bank shall review its Consolidated Reports of Condition and Income filed with the FDIC on or after December 31, 2008, and amend said reports if necessary to accurately reflect the financial condition of the Bank as of the date of each such report. Reports filed after the effective date of this ORDER shall also accurately reflect the financial condition of the Bank as of the reporting date.

### **COMPLIANCE COMMITTEE**

16. Within 45 days from the effective date of this ORDER, the Board shall establish a committee of the Board members charged with the responsibility of ensuring that the Bank complies with the provisions of this ORDER. At least 3 of the members of such committee shall be Board members not employed in any capacity by the Bank other than as a trustee. The committee shall report monthly to the full Board, and a copy of the report and any discussion relating to the report or the ORDER shall be noted in the minutes of the Board meeting. The establishment of this committee shall not diminish the responsibility of liability of the entire

Board to ensure compliance with the provisions of this ORDER.

### **PROGRESS REPORTS**

17. Within 45 days after the end of each calendar quarter following the effective date of this ORDER, the Bank shall furnish to the Regional Director written progress reports detailing the form and manner of any actions taken to secure compliance with this ORDER and the results thereof. Such reports may be discontinued when the corrections required by this ORDER have been accomplished and the Regional Director has released, in writing, the Bank from making further reports.

### **CORRECTION AND PREVENTION**

18. Beginning on the effective date of this ORDER, the Bank shall take steps necessary, consistent with other provisions of this ORDER and sound banking practices, to eliminate or correct and prevent the unsafe or unsound banking practices and violations of law and/or regulation and all contraventions of federal banking agency policies and procedures and guidelines that were identified in the Report of Examination and the Compliance Examination Report.

### **OTHER ACTIONS**

19. It is expressly and clearly understood that if, at any time, the Regional Director shall deem it appropriate in fulfilling the responsibilities placed upon him or her under applicable law to undertake any further action affecting the Bank, nothing in this ORDER shall in any way inhibit, estop, bar or otherwise prevent him or her from doing so, including, but not limited to, the imposition of civil money penalties.

### **ORDER EFFECTIVE**

20. This ORDER shall be binding upon the Bank, its successors and assigns, and all institution-affiliated parties of the Bank. The provisions of this ORDER shall remain effective

