

FILED

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING AND SECURITIES 2014 AUG -7 PM 2: 12

PA DEPARTMENT OF  
BANKING AND SECURITIES

Commonwealth of Pennsylvania  
Department of Banking and Securities  
Bureau of Commercial Institutions

v.

Docket No. 14 0031 (BNK-ORD)

First Cornerstone Bank

AMENDED CONSENT ORDER

WHEREAS, First Cornerstone Bank, King of Prussia, Pennsylvania ("Bank"), is a Pennsylvania state-chartered bank subject to regulation by the Commonwealth of Pennsylvania Department of Banking and Securities ("Department") and the Federal Deposit Insurance Corporation ("FDIC");

WHEREAS, the Bureau of Commercial Institutions ("Bureau") is the Bureau within the Department primarily responsible for the regulation and supervision of the Bank;

WHEREAS, the Bank entered into a Consent Order with the Bureau on May 12, 2010 based on the results of a joint examination with the FDIC as of June 30, 2009;

WHEREAS, since the Consent Order, the Bureau and the FDIC engaged in another joint examination of the Bank on February 19, 2014 and reviewed the Bank's records as of December 31, 2013;

WHEREAS, during the February 19, 2014 examination, the Bureau and FDIC reviewed, in relevant part, compliance with the Consent Order;

WHEREAS, the Bureau is concerned that the Bank continues to engage in unsafe and unsound banking practices;

**WHEREAS**, to address these concerns, the Bank, without admitting or denying wrongdoing, entered into an Amended Stipulation and Consent to Entry of Order executed by the Bank's Board of Directors ("Board") whereby it agreed to the Bureau's issuance of this Amended Order;

**WHEREAS**, the Bureau issues this Amended Order ("Order") to replace the terms of the May 12, 2010 Consent Order;

**IT IS HEREBY ORDERED**, pursuant to Section 501.A of the Department of Banking and Securities Code, 71 P.S. § 733-501.A, that the Bank, its directors, officers, employees, agents, and other "institution-affiliated parties," as that term is defined in Section 3(u) of the Federal Deposit Insurance Act, 12 U.S.C. § 1813(u), and its successors and assigns, shall take the following affirmative action:

1. Management.

(a) 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 complexity and experience in upgrading a low quality loan portfolio; a 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. The Board shall provide the necessary written authority to management to implement the provisions of this Amended Order.

(b) The qualifications of management shall be assessed on its ability to:

- (i) comply with the requirements of this Amended Order;
- (ii) operate the Bank in a safe and sound manner;
- (iii) comply with applicable laws, rules, and regulations; and
- (iv) restore all aspects of the Bank to a safe and sound condition, including capital adequacy, asset quality, management effectiveness, earnings, liquidity, and sensitivity to interest rate risk.

(c) Within 60 days from the effective date of this Amended Order, the Board, or a committee appointed by the Board, shall analyze and assess the Bank's management, staffing performance, and needs. The analysis and assessment shall be summarized in a written report ("Management Report"). At a minimum, the Management Report shall:

- (i) identify the type and number of officer positions needed to manage and supervise the affairs of the Bank, detailing any vacancies or additional needs and giving appropriate consideration to the size and complexity of the Bank;
- (ii) identify the type and number of staff positions needed to carry out the Bank's strategic plan, detailing any vacancies or additional needs;
- (iii) present a clear and concise description of the relevant knowledge, skills, abilities, and experience necessary for each position, including delegations of authority and performance objectives;
- (iv) identify training and development needs;
- (v) identify and establish Bank committees needed to provide guidance and oversight to management; and
- (vi) evaluate the current and past performance of all existing Bank officers, at the Vice President level and above, indicating whether the individuals

are competent and qualified to perform present and anticipated duties, adhere to the Bank's established policies and practices, and operate the Bank in a safe and sound manner.

2. Board Participation.

(a) The Board shall increase its participation in the affairs of the Bank, assuming full responsibility for the approval of sound policies and objectives and for the supervision of all of the Bank's activities, consistent with the role and expertise commonly expected for directors of banks of comparable size.

(b) This participation shall include meetings to be held no less frequently than monthly at which, at a minimum, the following areas shall be reviewed and approved: reports of income and expenses; new, overdue, renewal, insider, charged off, and recovered loans; investment activity; liquidity levels and funds management; adoption or modification of operating policies; individual committee reports; audit reports; internal control reviews including managements' responses; reconciliation of general ledger accounts; and compliance with this Amended Order. Board minutes shall document these reviews and approvals, including the names of any dissenting directors.

(c) The Bank shall notify the Director of the Bureau of Commercial Institutions of the Pennsylvania Department of Banking and Securities ("Bureau Director") and the Regional Director of the FDIC's New York Regional Office ("Regional Director") in writing of any resignations or terminations of any members of its Board or any of its "senior executive officers" (as that term is defined in section 303.101(b) of the FDIC's Rules and Regulations, 12 C.F.R. § 303.101(b)) within 10 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). 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's Rules and Regulations, 12 C.F.R. Part 303.

3. Classified Assets Reduction.

(a) Within 60 days from the effective date of this Amended Order, the Bank shall formulate and submit for review as described in subparagraph (c), a written plan ("Classified Asset Plan") to reduce the Bank's risk position in each asset in excess of \$200,000 which is classified "Substandard" or "Doubtful" in the February 19, 2014 Report of Examination. For purposes of this provision, "reduce" means to collect, charge off, or improve the quality of an asset so as to warrant its removal from adverse classification by the Bureau Director and the Regional Director.

(b) The Classified Asset Plan shall include, at a minimum, the following:

(i) an action plan to review, analyze and document the current financial condition of each classified borrower including source of repayment, repayment ability, and alternative repayment sources, as well as the value and accessibility of any pledged or assigned collateral, and any possible actions to improve the Bank's collateral position;

(ii) a specific action plan to reduce delinquencies and classified assets to 100% of Tier 1 Capital and allowance for loan and lease losses ("ALLL"); and 60% of Tier 1 Capital and ALLL within 6 and 12 months, respectively, from the effective date of this Amended Order;

(iii) specific action plans intended to reduce the Bank's risk exposure in each classified asset;

(iv) delineate areas of responsibility for loan officers; and

(v) provide for the submission of monthly written progress reports to the Board for review and notation in minutes of the Board meetings.

(c) The Classified Asset Plan shall be submitted to the Bureau Director and the Regional Director for non-objection or comment. Within 60 days from receipt of non-objection or any comments from the Bureau Director and the Regional Director, and after incorporation and adoption of all comments, the Board shall approve the Classified Asset Plan, which approval shall be recorded in the minutes of the Board meeting. Thereafter, the Bank shall implement and fully comply with the Classified Asset Plan.

(d) The Bank shall not extend, directly or indirectly, any additional credit to, or for the benefit of, any borrower who is already obligated in any manner to the Bank on any extensions of credit (including any portion thereof) that has been charged off the books of the Bank or classified "Loss" in the February 19, 2014 or any future Report of Examination, so long as such credit remains uncollected.

(e) The Bank shall not extend, directly or indirectly, any additional credit to, or for the benefit of, any borrower whose loan or other credit has been classified "Substandard," "Doubtful," or is listed for "Special Mention" in the February 19, 2014 or any future Report of Examination, and is uncollected, unless the Board or a designated committee thereof provides, in writing, a detailed explanation of why the extension is in the best interest of the Bank. Prior to extending additional credit pursuant to this

subparagraph, whether in the form of a renewal, extension, or further advance of funds, such additional credit shall be approved by the Board, who shall determine that:

(i) the failure of the Bank to extend such credit would be detrimental to the best interests of the Bank, with a written explanation of why the failure to extend such credit would be detrimental;

(ii) the extension of such credit would improve the Bank's position, with a written explanatory statement of how and why the Bank's position would improve; and

(iii) an appropriate workout plan has been developed and will be implemented in conjunction with the additional credit to be extended.

(f) The Board's determinations and approval shall be recorded in the minutes of the Board meeting and copies shall be submitted to the Bureau Director and the Regional Director at such times as the Bank submits the progress reports required by this Amended Order or sooner upon the written request of the Bureau Director or the Regional Director.

4. Loan Review Program.

(a) Within 30 days from the effective date of this Amended Order, the Board shall establish a program of independent loan review that will provide for a quarterly review of the Bank's loan portfolio and the identification and categorization of problem credits ("Loan Review Program").

(b) At a minimum, the Loan Review Program shall provide for:

(i) prompt identification of loans with credit weaknesses that warrant the special attention of management, including the name of the borrower, amount

of the loan, reason why the loan warrants special attention; and assessment of the degree of risk that the loan will not be fully repaid according to its terms;

(ii) prompt identification of all outstanding balances and commitments attributable to each obligor identified under the requirements of subparagraph (i), including outstanding balances and commitments attributable to related interests of such obligors, including the obligor of record, relationship to the primary obligor identified under subparagraph (i), and an assessment of the risk exposure from the aggregate relationship;

(iii) identification of trends affecting the quality of the loan portfolio and potential problem areas;

(iv) assessment of the overall quality of the loan portfolio;

(v) identification of credit and collateral documentation exceptions;

(vi) identification and status of violations of laws, rules, or regulations with respect to the lending function;

(vii) identification of loans that are not in conformance with the Bank's Loan Policy;

(viii) identification of loans to directors, officers, principal shareholders, and their related interests; and

(ix) a mechanism for reporting periodically, but in no event less than quarterly, the information developed in (i) through (viii) above to the Board.

(c) The Loan Review Program shall be submitted to the Bureau Director and the Regional Director for non-objection or comment. Within 30 days from receipt of non-objection or any comments from the Bureau Director and the Regional Director, and after



incorporation and adoption of all comments, the Board shall approve the Loan Review Program, which approval shall be recorded in the minutes of the Board meeting. Thereafter, the Bank shall implement and fully comply with the Loan Review Program.

5. Capital.

(a) Within 60 days from the effective date of this Amended Order, the Bank shall meet and maintain the following minimum capital levels (as defined in Part 325 of the FDIC's Rules and Regulations, 12 C.F.R. Part 325), after establishing an appropriate ALLL:

(i) Tier 1 Capital at least equal to 8 percent of total assets;

(ii) Tier 1 risk-based Capital at least equal to 10.5 percent of total risk-weighted assets; and

(iii) Total risk-based Capital at least equal to 12 percent of total risk-weighted assets.

(b) For purposes of this Amended Order, all terms relating to capital shall be calculated in accordance with Part 325 of the FDIC's Rules and Regulations, 12 C.F.R. Part 325, and 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's Rules and Regulations, 12 C.F.R. Part 325, App. A.

(c) In the event any capital ratio falls below the minimum required by this Amended Order, the Bank shall immediately notify the Bureau Director and the Regional Director; and

(i) within 15 days shall increase capital in an amount sufficient to comply with this Amended Order; or

(ii) within 60 days shall develop a written plan ("Capital Plan") describing the primary means and timing by which the Bank shall increase its capital ratios up to or in excess of the minimum requirements set forth in this Amended Order including a contingency plan ("Contingency Plan") for the sale, merger, or liquidation of the Bank in the event the primary sources of capital are not available within 90 days. The Capital Plan and Contingency Plan shall be submitted for review as described in subparagraph (e).

(d) At a minimum, the Capital Plan shall include:

(i) specific plans to achieve the capital levels required under this Amended Order;

(ii) specific plans for the maintenance of adequate capital that may in no event be less than the requirements of the provisions of this Amended Order;

(iii) projections for asset growth and capital requirements, and such projections shall be based upon a detailed analysis of the Bank's current and projected assets, liabilities, earnings, fixed assets, and off-balance sheet activities, each of which shall be consistent with the Bank's strategic business plan;

(iv) projections for the amount and timing of the capital necessary to meet the Bank's current and future needs;

(v) the primary source(s) from which the Bank will strengthen its capital to meet the Bank's needs; and

(vi) contingency plans that identify alternative sources of capital should the primary source(s) under (v) above not be available.

(e) The Capital Plan and the Contingency Plan shall be submitted to the Bureau Director and the Regional Director for non-objection or comment. Within 30 days from receipt of non-objection or any comments from the Bureau Director and the Regional Director, and after incorporation and adoption of all comments, the Board shall approve the Capital Plan and the Contingency Plan, which approval shall be recorded in the minutes of the Board meeting. Thereafter, the Bank shall implement and fully comply with the Capital Plan and, to the extent necessary, the Contingency Plan.

(f) The Board shall review the Bank's adherence to the Capital Plan, at minimum, on a monthly basis. Copies of the reviews and updates shall be submitted to the Bureau Director and the Regional Director as part of the progress reports required by this Amended Order.

6. Profit and Budget Plan.

(a) Within 60 days from the effective date of this Amended Order, and within the first 30 days of each calendar year thereafter, the Bank shall formulate and submit for review as described in subparagraph (c), a written profit and budget plan ("Profit Plan") consisting of goals and strategies, consistent with sound banking practices, and taking into account the Bank's other written plans, policies, or other actions as required by this Amended Order.

(b) The Profit Plan shall include, at a minimum:

- (i) a description of the operating assumptions that form the basis for, and adequately support, material projected revenue and expense components;
- (ii) specific goals to maintain appropriate provisions to the ALLL;

(iii) realistic and comprehensive budgets for all categories of income and expense;

(iv) an executive compensation plan, addressing any and all salaries, bonuses and other benefits of every kind or nature whatsoever, both current and deferred, whether paid directly or indirectly, which plan incorporates qualitative as well as profitability performance standards for the Bank's senior executive officers;

(v) a budget review process to monitor the revenue and expenses of the Bank whereby actual performance is compared against budgetary projections not less than quarterly; and

(vi) recording the results of the budget review and any actions taken by the Bank as a result of the budget review in the Board minutes.

(c) The Profit Plan shall be submitted to the Bureau Director and the Regional Director for non-objection or comment. Within 30 days from receipt of non-objection or any comments from the Bureau Director and the Regional Director, and after incorporation and adoption of all comments, the Board shall approve the Profit Plan, which approval shall be recorded in the minutes of the Board meeting. Thereafter, the Bank shall implement and fully comply with the Profit Plan.

(d) Within 60 days following the end of each calendar quarter following adoption of the Profit Plan required by this paragraph, the Board shall evaluate the Bank's actual performance in relation to the Profit Plan, record the results of the evaluation, and note any actions taken by the Bank in the minutes of the Board meeting at which such evaluation is undertaken.

7. Strategic Plan.

(a) Within 90 days from the effective date of this Amended Order, the Bank shall develop and submit for review as required by subparagraph (c), a written strategic plan ("Strategic Plan") supported by an operating budget and consisting of goals and strategies, consistent with sound banking practices, and taking into account the Bank's other written plans, policies, or other actions as required by this Amended Order. 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 include, at a minimum:

(i) identification of the major areas in and means by which the Bank will seek to improve operating performance;

(ii) specific goals to improve the net interest margin, increase interest income, reduce discretionary expenses;

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

(iv) coordination of the Bank's loan, investment, funds management, and operating policies, profit and budget plan, and ALLL methodology with the Strategic Plan.

(c) The Strategic Plan shall be submitted to the Bureau Director and the Regional Director for non-objection or comment. Within 30 days from receipt of non-objection or any comments from the Bureau Director and the Regional Director, and after incorporation and adoption of all comments, the Board shall approve the Strategic Plan,

which approval shall be recorded in the minutes of the Board meeting. Thereafter, the Bank shall implement and fully comply with the Strategic Plan.

(d) The Strategic Plan required by this Amended Order shall be revised 30 days prior to the end of each calendar year, and approved by the Board, which approval shall be recorded in the minutes of the Board meeting. Thereafter, the Bank shall implement and adhere to the revised Strategic Plan.

8. Liquidity and Funds Management.

(a) Within 90 days from the effective date of this Amended Order, the Bank shall revise its liquidity and funds management policy to strengthen the Bank's funds management procedures and maintain adequate provisions to meet the Bank's liquidity needs ("Liquidity and Funds Management Policy"). The policy shall be submitted for review as described in subparagraph (c).

(b) The Liquidity and Funds Management Policy shall include, at a minimum, provisions that:

(i) provide a statement of the Bank's long-term and short-term liquidity needs and plans for ensuring that such needs are met;

(ii) provide for a periodic review of the Bank's deposit structure, including the volume and trend of total deposits and the volume and trend of the various types of deposits offered, the maturity distribution of time deposits, rates being paid on each type of deposit, rates being paid by trade area competition, caps on large time deposits, public funds, out-of-area deposits, and any other information needed;

(iii) establish 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;

(iv) identify the source and use of borrowed and/or volatile funds;

(v) establish 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;

(vi) require 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;

(vii) establish a minimum liquidity ratio and defining how the ratio is to be calculated;

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

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

(x) comply with the guidance set forth in *Liquidity Risk Management* (FIL-84-2008, issued August 26, 2008).

(c) The Liquidity and Funds Management Policy shall be submitted to the Bureau Director and the Regional Director for non-objection or comment. Within 30 days from receipt of non-objection or any comments from the Bureau Director and the Regional Director, and after incorporation and adoption of all comments, the Board shall approve the Liquidity and Funds Management Policy, which approval shall be recorded in the minutes of the Board meeting. Thereafter, the Bank shall implement and fully comply with the Liquidity and Funds Management Policy.

(d) The Bank shall review annually its Liquidity and Funds Management Policy for adequacy and, based upon such review, shall make necessary revisions to the policy.

9. Growth Restriction.

(a) The Bank shall not increase its total assets by more than 10 percent during any consecutive three-month period without providing, at least 30 days prior to its implementation, a growth plan ("Growth Plan") to the Bureau Director and the Regional Director. The Growth Plan, at a minimum, shall include the funding source to support the projected growth, as well as the anticipated use of funds. The Growth Plan shall not be implemented without the prior written consent of the Bureau Director and the Regional Director.

(b) In no event shall the Bank increase its total assets by more than 10 percent during calendar year 2014. In no event shall the Bank increase its total assets by more than 20 percent annually thereafter. For the purpose of this paragraph, "total assets" shall be defined as in the FFIEC's Instructions for Call Reports.



10. Corrective Action.

The Bank shall take all steps necessary, consistent with other provisions of this Amended Order and safe and sound banking practices, to eliminate or correct and prevent unsafe or unsound banking practices, violations of law or regulation, and all contraventions of regulatory policies or guidelines cited in the February 19, 2014 Report of Examination.

11. Brokered Deposits.

The Bank shall not accept, renew, or rollover any brokered deposit, as defined by section 337.6(a)(2) of the FDIC's Rules and Regulations, 12 C.F.R. § 337.6(a)(2), unless it is in compliance with the requirements of 12 C.F.R. § 337.6(b), governing solicitation and acceptance of brokered deposits by insured depository institutions.

The Bank shall comply with the restrictions on the effective yields on deposits described in section 337.6 of the FDIC's Rules and Regulations, 12 C.F.R. § 337.6.

12. Shareholder Disclosure.

Following the effective date of this Amended Order, the Bank shall provide to its shareholders or otherwise furnish a description of this Amended Order, in conjunction with the Bank's next shareholder communication and in conjunction with its notice or proxy statement preceding the Bank's next shareholder meeting. The description shall fully describe the Amended Order in all material respects. The description and any accompanying communication, statement, or notice shall be sent to the Bureau Director and the FDIC, Division of Risk Management Supervision, Accounting-Registration, Disclosure and Securities Section, 550 17th Street, N.W., Washington, D.C. 20429, for non-objection or comment at least 30 days prior to dissemination to shareholders. Any changes requested to be made by the Bureau Director or the FDIC shall be made prior to dissemination of the description, communication, notice, or statement.

13. Dividend Restriction.

The Bank shall not declare or pay any dividend without the prior written consent of the Bureau Director and the Regional Director.

14. Fidelity Bond.

(a) Immediately upon renewal of the Bank's current bond required by 7 P.S. § 1410 ("Bond") the Bank shall provide a full and complete copy to the Bureau Director and Regional Director. The Bank shall provide a copy of the required Bond to the Bureau Director and Regional Director each time the Bond is renewed while this Amended Order remains in effect.

(b) The Bank shall immediately notify the Bureau Director and Regional Director if it receives any notifications or information from the Bank's bond insurance carrier, its agents and/or representatives that the Bond is not going to be renewed or will be terminated.

15. Compliance Committee.

(a) Within 30 days from the effective date of this Amended Order, the Board shall establish a compliance committee ("Compliance Committee"), a majority of which members who are not now, and have never been, involved in the daily operations of the Bank, with the responsibility of ensuring compliance with the provisions of this Amended Order.

(b) The Compliance Committee shall monitor compliance with this Amended Order and submit a written report monthly to the entire Board, and a copy of the report and any discussion related to the report or this Amended Order shall be part of the minutes of the Board meeting. Copies of the monthly report shall be submitted to the Bureau Director and the Regional Director as part of the progress reports required by this Amended Order. Nothing contained herein shall diminish the responsibility of the entire Board to ensure compliance with the provisions of this Amended Order.

16. Progress Reports.

Within 45 days from the end of each calendar quarter following the effective date of this Amended Order, the Bank shall furnish to the Bureau Director and the Regional Director, written progress reports detailing the form, manner, and results of any actions taken to secure compliance with this Amended Order. All progress reports and other written responses to this Amended Order shall be reviewed by the Board and made a part of the Board minutes.

17. Section 403 Reports to the Bureau. All reports that the Bank must submit to the Bureau per this Amended Order are special reports as set forth in Section 403 of the Department of Banking and Securities Code, 71 P.S. § 733-403.B.

18. Publication. The Department will publish this Amended Order pursuant to its authority in Section 302.A.(5) of the Department of Banking and Securities Code, 71 P.S. §733-302.A(5).

19. Other Actions.

(a) If at any time the Department shall deem it appropriate in fulfilling the responsibilities placed upon the Department under applicable law to undertake any further action affecting the Bank or any of the Bank's current or former institution-affiliated parties, nothing in this Amended Order shall in any way inhibit, estop, bar or otherwise the Department from doing so.

(b) Nothing herein shall preclude any proceedings brought by the Department to enforce the terms of this Amended Order and nothing herein constitutes a waiver of any right, power or authority of any other representatives of the United States, departments or agencies thereof, Department of Justice, or any other representatives of the Commonwealth

of Pennsylvania or any other departments or agencies thereof, including any prosecutorial agency, to bring other actions as appropriate.

20. Communications. All communications regarding this Amended Order shall be sent to:

Robert C. Lopez, Director  
Bureau of Commercial Institutions  
Commonwealth of Pennsylvania  
Department of Banking and Securities  
17 North Second Street, Suite 1300  
Harrisburg, PA 17101

21. Binding Nature. The provisions of this Amended Order including the recital paragraphs shall be binding upon the Bank, its institution-affiliated parties, and their successors and assigns.

22. Titles. The titles used to identify the paragraphs of this document are for the convenience of reference only and do not control the interpretation of this document.

23. Effective Date. The effective date of this Amended Order shall be the date upon which this Amended Order has been executed by the Bureau. Each provision of this Amended Order shall remain effective and enforceable, jointly and severally, until stayed, modified, terminated or suspended by the Bureau.

**SO ORDERED.**

Dated: August 6, 2014

By: Redacted  
~~Robert C. Lopez, Director~~  
Bureau of Commercial Institutions  
Commonwealth of Pennsylvania  
Department of Banking and Securities  
17 North Second Street  
Harrisburg, PA 17101