

UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
OFFICE OF THE COMPTROLLER OF THE CURRENCY

In the Matter of:

USAA Federal Savings Bank
San Antonio, Texas

AA-EA-2018-90

CONSENT ORDER

WHEREAS, the Office of the Comptroller of the Currency (“OCC”) has supervisory authority over USAA Federal Savings Bank, San Antonio, Texas (“Bank”);

WHEREAS, the OCC intends to initiate cease and desist proceedings against the Bank pursuant to 12 U.S.C. § 1818(b), through the issuance of a Notice of Charges, for engaging in unsafe or unsound banking practices, including those relating to the Bank’s compliance management system, risk governance framework, and information technology (“IT”) program;

WHEREAS, in the interest of cooperation and to avoid additional costs associated with administrative and judicial proceedings with respect to the above matter, the Bank, by and through its duly elected and acting Board of Directors (“Board”), consents to the issuance of this Consent Order (“Order”), by the OCC through the duly authorized representative of the Comptroller of the Currency (“Comptroller”); and

NOW, THEREFORE, pursuant to the authority vested in the OCC by Section 8(b) of the Federal Deposit Insurance Act, as amended, 12 U.S.C. § 1818(b), the OCC hereby orders that:

ARTICLE I

JURISDICTION

(1) The Bank is an “insured depository institution” as that term is defined in 12 U.S.C. § 1813(c)(2).

(2) The Bank is a Federal savings association within the meaning of 12 U.S.C. § 1813(q)(1)(C), and is chartered and examined by the OCC. *See* 12 U.S.C. §§ 1461 *et seq.*, 5412(b)(2)(B).

(3) The OCC is the “appropriate Federal banking agency” as that term is defined in 12 U.S.C. § 1813(q) and is therefore authorized to initiate and maintain this cease and desist action against the Bank pursuant to 12 U.S.C. § 1818(b).

ARTICLE II

COMPTROLLER’S FINDINGS

The Comptroller finds, and the Bank neither admits nor denies, the following:

(1) The Bank has failed to implement and maintain an effective Bank-wide Risk Management Program commensurate with the Bank’s size, complexity, and risk profile. The Bank’s failure to implement and maintain an effective Bank-wide Risk Management Program is an unsafe or unsound practice.

(2) The Bank’s internal controls and information systems do not comply with the guidelines established in 12 C.F.R. Part 30, Appendix A.

(3) The Bank’s internal audit program (“Internal Audit”) is insufficient given the Bank’s size, complexity, and risk profile, and is not in compliance with the guidelines established in 12 C.F.R. Part 30, Appendix A.

(4) The Bank has failed to implement and maintain an effective compliance management system that includes processes and practices designed to manage consumer compliance risk, support compliance with consumer protection-related laws and regulations, and prevent consumer harm. The Bank's failure to implement and maintain a satisfactory compliance management system is an unsafe or unsound practice.

(5) The Bank has failed to implement and maintain an effective, comprehensive IT program, and its IT program is not in compliance with the guidelines established in 12 C.F.R. Part 30, Appendix B.

ARTICLE III

COMPLIANCE COMMITTEE

(1) Within fifteen (15) days of the effective date of this Order, the Board shall appoint a compliance committee of at least three (3) members, of which a majority shall be directors who are not employees or officers of the Bank or any of its subsidiaries ("Compliance Committee"). The Board shall submit in writing to the Assistant Deputy Comptroller the names of the members of the Compliance Committee within ten (10) days of their appointment. In the event of a change of the membership, the Board shall submit in writing to the Assistant Deputy Comptroller within ten (10) days the name of any new or resigning committee member. The Compliance Committee shall monitor and oversee the Bank's compliance with the provisions of this Order. The Compliance Committee shall meet at least quarterly and maintain minutes of its meetings.

ARTICLE IV

ACTION PLAN

(1) Within seventy-five (75) days of the effective date of this Order, the Bank shall develop a written plan detailing the remedial actions necessary to achieve compliance with Articles V through VII of this Order (“Action Plan”) and submit the Action Plan to the OCC for prior written determination of no supervisory objection by the Assistant Deputy Comptroller.

The Action Plan, at a minimum, shall specify:

- (a) a description of the corrective actions needed to achieve compliance with each Article of this Order;
- (b) reasonable and well-supported timelines for completion of the corrective actions required by this Order; and
- (c) the person(s) responsible for completion of the corrective actions required by this Order.

(2) The timelines contained in the Action Plan shall be consistent with any deadlines set forth in this Order, including any modifications to the Order made pursuant to Article XI, Paragraph (4).

(3) In the event the Assistant Deputy Comptroller requires changes to the Action Plan, the Bank shall incorporate the required changes into the Action Plan and submit the revised Action Plan to the Assistant Deputy Comptroller for review and prior written determination of no supervisory objection.

(4) Upon receipt of a written determination of no supervisory objection from the Assistant Deputy Comptroller, the Board shall adopt the Action Plan and ensure management has timely implemented, and thereafter adheres to, the Action Plan, and that Internal Audit performs

appropriate verification procedures with respect to the Action Plan, including the timelines set forth within the Action Plan.

(5) The Bank shall not take any action that will cause a significant deviation from, or material change to, the Action Plan. Where the Bank considers modifications to the Action Plan appropriate, the Bank shall submit a revised Action Plan containing the proposed modifications to the OCC for prior written determination of no supervisory objection by the Assistant Deputy Comptroller. Upon receipt of a written determination of no supervisory objection from the Assistant Deputy Comptroller, the Board shall adopt the revised Action Plan and ensure management has timely implemented, and thereafter adheres to, the revised Action Plan, and that Internal Audit performs appropriate verification procedures with respect to the revised Action Plan, including the timelines set forth within the Action Plan.

(6) Within ninety (90) days of receipt of a prior written determination of no supervisory objection to the Action Plan, and thereafter within thirty (30) days after the end of each quarter, the Bank shall prepare, and shall submit to the Board, a written Action Plan progress report setting forth in detail:

- (a) the specific corrective actions undertaken to comply with each Article of this Order;
- (b) the results and status of the corrective actions;
- (c) a listing of all changes made to the Action Plan since the last progress report; and
- (d) a description of the outstanding corrective actions needed to achieve compliance with each Article of this Order and the party or parties responsible for the completion of outstanding corrective actions.

The Board shall forward a copy of the report, with any additional comments by the Board, to the Assistant Deputy Comptroller within ten (10) days of the first Board meeting following the Board's receipt of such reports.

(7) Within one hundred twenty (120) days of receipt of a prior written determination of no supervisory objection to the Action Plan, and on a recurring basis every one hundred twenty (120) days thereafter, Internal Audit shall complete an assessment of the Bank's progress towards implementing the Action Plan. The findings shall be memorialized in writing and, within thirty (30) days of completing the assessment, Internal Audit shall provide its written findings to the Compliance Committee and the Assistant Deputy Comptroller.

ARTICLE V

RISK MANAGEMENT AND RISK GOVERNANCE FRAMEWORK

(1) Within sixty (60) days of receipt of a prior written determination of no supervisory objection to the Action Plan, the Bank shall prepare and submit to the OCC, for a written determination of no supervisory objection by the Assistant Deputy Comptroller, a written plan to strengthen the Bank's Risk Governance Framework ("RGF Action Plan"), including timeframes for corrective action. In the event the Assistant Deputy Comptroller directs the Bank to revise the RGF Action Plan, the Bank shall promptly make the necessary and appropriate revisions and submit the revised RGF Action Plan to the OCC for review and written determination of no supervisory objection by the Assistant Deputy Comptroller. The RGF Action Plan shall, at a minimum, provide for:

- (a) an assessment of the Bank's compliance with 12 C.F.R. Part 30, Appendices A (Safety and Soundness Guidelines) and D (Heightened

Standards), identify enhancements needed, and provide specific timelines for corrective action;

- (b) the identification of specific corrective actions for front line units, independent risk management, and internal audit, including but not limited to:
 - i. steps to improve the effectiveness of the Bank's system of internal controls and corporate governance, including but not limited to Board oversight, committee structure, and information received, clear assignments of roles and responsibilities, and actions to hold management accountable;
- (c) the independent risk management function's development of a standardized framework for conducting risk control self-assessments;
- (d) training on the Bank's Risk Governance Framework for all affected business operations units and the Board;
- (e) a requirement that each business operations unit implement and adhere to a comprehensive risk control self-assessment framework, to include:
 - i. a description of the scope of operations, all significant risks associated with the operations, specific controls for each identified risk, and an assessment of the controls, risk management, and compliance with the Bank's risk appetite and associated limits or thresholds;
- (f) an effective third-party risk management program supported by sufficiently skilled staff and resources that provides appropriate initial and

ongoing oversight of third parties, including comprehensive due diligence, risk assessment, and testing. Refer to OCC Bulletin 2013-29, Third-Party Relationships: Risk Management Guidance, for additional guidance;

- (g) the identification of the skills and expertise needed to execute the RGF Action Plan and of any gaps with current staff, along with a program to develop, attract, and retain talent and maintain appropriate staffing levels to fulfill respective roles in the Bank's Risk Governance Framework; and
- (h) timely, risk-based comprehensive audits of business units and independent risk management by Internal Audit to assess compliance with the Risk Governance Framework, the findings of which shall promptly be reported to the Board or a designated Board committee.

(2) Upon receipt of a determination of no supervisory objection from the Assistant Deputy Comptroller, the Board shall adopt the RGF Action Plan and ensure management has timely implemented, and thereafter adheres to, the RGF Action Plan.

(3) In the event the Bank believes material changes to the RGF Action Plan are appropriate, the Bank shall submit a revised RGF Action Plan to the OCC for review and prior written determination of no supervisory objection by the Assistant Deputy Comptroller.

ARTICLE VI

COMPLIANCE RISK MANAGEMENT PROGRAM

(1) Within ninety (90) days of receipt of a prior written determination of no supervisory objection to the Action Plan, the Bank shall prepare and submit a written Compliance Risk Management Program ("CRMP") to the OCC, for review and written determination of no supervisory objection by the Assistant Deputy Comptroller. The CRMP

shall, at a minimum, include:

- (a) an effective compliance risk governance framework that establishes the roles, responsibility, and accountability for respective front line units and independent compliance risk management;
- (b) a program and methodology adhered to by front line units to assess, measure, and limit regulatory compliance exposures on an ongoing basis commensurate with the risk profile and risk appetite of the Bank;
- (c) a program and methodology adhered to by independent compliance risk management to assess, measure, aggregate, and limit regulatory compliance exposures on an ongoing basis commensurate with the risk profile and risk appetite of the Bank;
- (d) establishment of and adherence to procedures and processes that result in compliance with Bank-wide corporate policies, laws, and regulations (including, but not limited to, state consumer protection laws, “Federal consumer financial law” as defined at 12 U.S.C. § 5481, Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, the Flood Disaster Protection Act, 42 U.S.C. § 4001, et seq., and the Servicemembers Civil Relief Act, 50 U.S.C. § 3901, et seq.);
- (e) identification of the skills and expertise needed to execute the CRMP and of any gaps with current staff, along with a program to develop, attract, and retain talent, and maintain appropriate staffing levels to fulfill respective roles in the Bank’s compliance risk management framework;
- (f) an effective, independent monitoring and testing function supported by

sufficiently skilled staff and resources that provides risk-based scope and coverage to provide credible challenge and escalation of issues identified by front line units;

- (g) a program that establishes Bank-wide policies and processes to promote effective compliance governance and to develop and maintain an effective change management program;
- (h) a program to provide for effective third-party compliance risk management;
- (i) compliance information systems to measure, track, and report risk;
- (j) procedures for reporting and escalating significant compliance concerns to senior management and the Board; and
- (k) a comprehensive training program for front line units, independent compliance risk, and internal audit staff that addresses relevant state and federal laws and regulations and impending publicly-announced changes to relevant state and federal laws and regulations.

(2) The CRMP shall also include:

- (a) policies and procedures for managing customer complaints and providing customer remediation when necessary;
- (b) remediation policies and procedures, which shall include:
 - i. a methodology for identifying adversely affected customers (which, for purposes of the CRMP, does not include emotional harm or distress);
 - ii. a process for quantifying the adverse impact on customers;

- iii. standards for development and review of remediation plans;
- iv. internal reporting processes and validation;
- v. quarterly reporting of remediation plans and actions taken to the Board or a designated committee thereof and to the OCC; and
- vi. prompt notification to the OCC if any proposed remediation plan meets the criteria in paragraph (3) of this Article.

(3) The OCC may require submission of a remediation plan for a prior written determination of no supervisory objection by the Assistant Deputy Comptroller if the plan meets any of the following criteria (which criteria may be revised by the OCC):

- (a) the anticipated amount of the remediation to be paid, refunded or remitted in total to the affected population exceeds \$1,000,000;
- (b) the number of customers or customer accounts likely to require remediation exceeds 10,000; or
- (c) the customer harm being remediated poses or has resulted in significant reputation risk to the Bank, or creates other supervisory concern.

(4) The CRMP shall contain a complete description of the actions necessary to achieve compliance with this Article. In the event the Assistant Deputy Comptroller directs the Bank to revise the CRMP, the Bank shall promptly make the necessary and appropriate revisions and submit a revised CRMP to the OCC for review and written determination of no supervisory objection by the Assistant Deputy Comptroller.

(5) Upon receipt of a written determination of no supervisory objection to the CRMP, the Board shall adopt the CRMP and ensure management has timely implemented, and thereafter adheres, to the CRMP. In the event the Bank believes material changes to the CRMP

are appropriate, the Bank shall submit a revised CRMP to the OCC for review and written determination of no supervisory objection by the Assistant Deputy Comptroller.

ARTICLE VII

INFORMATION TECHNOLOGY

(1) Within sixty (60) days of receipt of a prior written determination of no supervisory objection to the Action Plan, the Bank shall perform an assessment of the Bank's IT Risk Governance Program and prepare a written report detailing the Bank's findings ("IT Assessment"). The IT Assessment shall include, but not be limited to, the Bank's compliance with 12 C.F.R. Part 30, Appendix B and safe and sound banking practices relating to IT, as well as identification of the skills and expertise needed to develop and maintain a compliant and safe and sound IT program and of any gaps with current staff. Refer to the *FFIEC Information Technology Examination Handbook* for additional guidance. Upon completion, a copy of the IT Assessment shall be provided to the Board or a designated committee thereof and to the Assistant Deputy Comptroller.

(2) Within sixty (60) days of completion of the IT Assessment, the Bank shall prepare and submit to the OCC, for written determination of no supervisory objection by the Assistant Deputy Comptroller, a written plan describing the actions necessary for the Bank to implement and maintain an effective IT Risk Governance Program, including specific timeframes for the development and implementation of the required corrective action ("IT Risk Governance Plan"). In the event the Assistant Deputy Comptroller directs the Bank to revise the IT Risk Governance Plan, the Bank shall promptly make the necessary and appropriate revisions and submit the revised IT Risk Governance Plan to the Assistant Deputy Comptroller for review and written determination of no supervisory objection. Refer to the *FFIEC Information Technology*

Examination Handbook for additional guidance. The IT Risk Governance Plan shall, at a minimum, include:

- (a) an effective IT risk governance framework that establishes the roles, responsibilities, and accountability of front-line units and independent risk management;
- (b) a program to develop, attract, and retain talent and maintain appropriate staffing levels to fulfill respective roles in the Bank's IT program;
- (c) a program and methodology adhered to by front line units to assess, measure, and limit IT risks and concerns on an ongoing basis commensurate with the risk profile and risk appetite of the Bank;
- (d) a program and methodology to assess, measure, aggregate, and limit IT risks and concerns on an ongoing basis commensurate with the risk profile and risk appetite of the Bank applicable to each of the three lines of defense, namely front line units, independent risk management, and internal audit, as described in 12 C.F.R. Part 30, Appendix D;
- (e) an effective enterprise architecture;
- (f) an information security program that complies with the requirements set forth in 12 C.F.R. Part 30, Appendix B;
- (g) controls to ensure adherence to policies, procedures and processes;
- (h) IT risk appetite metrics and limits;
- (i) IT risk reporting and information systems;
- (j) procedures for reporting and escalating significant IT risks and concerns and remediation activities to senior management and the Board; and

- (k) a comprehensive training program for front line units, independent risk management, and internal audit personnel.

(3) Upon receipt of a determination of no supervisory objection from the Assistant Deputy Comptroller, the Board shall adopt the IT Risk Governance Plan and ensure management has timely implemented, and thereafter adheres to, the IT Risk Governance Plan. Prior to making any material changes to the IT Risk Governance Plan, the Bank shall submit a revised plan to the Assistant Deputy Comptroller for review and prior written determination of no supervisory objection.

ARTICLE VIII

GENERAL BOARD RESPONSIBILITIES

(1) The Board shall ensure that the Bank has timely adopted and implemented all corrective actions required by this Order, and shall verify that the Bank adheres to the corrective actions and they are effective in addressing the Bank's deficiencies that resulted in this Order.

(2) In each instance in which this Order imposes responsibilities upon the Board, it is intended to mean that the Board shall:

- (a) authorize, direct, and adopt corrective actions on behalf of the Bank as may be necessary to perform the obligations and undertakings imposed on the Board by this Order;
- (b) ensure that the Bank has sufficient processes, management, personnel, control systems, and corporate and risk governance to implement and adhere to all provisions of this Order;
- (c) require that Bank management and personnel have sufficient training and

authority to execute their duties and responsibilities pertaining to or resulting from this Order;

- (d) hold Bank management and personnel accountable for executing their duties and responsibilities pertaining to or resulting from this Order;
- (e) require appropriate, adequate, and timely reporting to the Board by Bank management of corrective actions directed by the Board to be taken under the terms of this Order; and
- (f) address any noncompliance with corrective actions in a timely and appropriate manner.

ARTICLE IX

WAIVERS

- (1) The Bank, by executing and consenting to this Order, waives:
 - (a) any and all rights to the issuance of a Notice of Charges pursuant to 12 U.S.C. § 1818;
 - (b) any and all procedural rights available in connection with the issuance of this Order;
 - (c) any and all rights to a hearing and a final agency decision pursuant to 12 U.S.C. § 1818 and 12 C.F.R. Part 109;
 - (d) any and all rights to seek any type of administrative or judicial review of this Order;
 - (e) any and all claims for fees, costs, or expenses against the OCC, or any of its officers, employees, or agents related in any way to this enforcement matter or this Order, whether arising under common law or under the

terms of any statute, including, but not limited to, the Equal Access to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412;

- (f) any and all rights to assert this proceeding, the consent to and/or the issuance of this Order, as the basis for a claim of double jeopardy in any pending or future proceeding brought by the United States Department of Justice or any other governmental entity; and
- (g) any and all rights to challenge or contest the validity of this Order.

ARTICLE X

OTHER PROVISIONS

- (1) Regarding the effect of this Order, and unless the OCC informs the Bank otherwise in writing with respect to any or all of the subparts below:
 - (a) pursuant to 12 C.F.R. § 5.3(g)(5), the Bank may be treated as an “eligible savings association” for the purposes of 12 C.F.R. Part 5, subject to the requirements contained in 12 C.F.R. § 5.3(g)(1)-(4); and
 - (b) pursuant to 12 C.F.R. § 5.51(c)(7)(ii), the Bank is not subject to the restrictions in 12 C.F.R. § 5.51 requiring prior notice to the OCC of changes in directors and senior executive officers or the limitations on golden parachute payments set forth in 12 C.F.R. Part 359, subject to the requirements contained in 12 C.F.R. § 5.51(c)(7)(i), (iii).
- (2) This Order supersedes all prior OCC communications issued pursuant to 12 C.F.R. §§ 5.3(g)(5) and 5.51(c)(7)(ii).

ARTICLE XI

CLOSING

(1) This Order is a settlement of the cease and desist proceeding against the Bank contemplated by the OCC, based on the unsafe or unsound practices and noncompliance with the guidelines established in 12 C.F.R. Part 30, Appendices A and B described in the Comptroller's Findings set forth in Article II of this Order. The OCC releases and discharges the Bank from all potential liability for a cease and desist order that has been or might have been asserted by the OCC based on the practices described in Article II of this Order, to the extent known to the OCC as of the effective date of this Order. Nothing in this Order, however, shall prevent the OCC from:

- (a) instituting enforcement actions other than a cease and desist order against the Bank based on the Comptroller's Findings set forth in Article II of this Order;
- (b) instituting enforcement actions against the Bank based on any other findings;
- (c) instituting enforcement actions against institution-affiliated parties (as defined by 12 U.S.C. § 1813(u)) based on the Comptroller's Findings set forth in Article II of this Order, or any other findings; or
- (d) utilizing the Comptroller's Findings set forth in Article II of this Order in future enforcement actions against the Bank or its institution-affiliated parties to establish a pattern or the continuation of a pattern.

(2) Nothing in this Order is a release, discharge, compromise, settlement, dismissal, or resolution of any actions, or in any way affects any actions that may be or have been brought

by any other representative of the United States or an agency thereof, including, without limitation, the United States Department of Justice.

(3) This Order is:

- (a) a “cease-and-desist order issued upon consent” within the meaning of 12 U.S.C. § 1818(b);
- (b) a “cease-and-desist order which has become final” within the meaning of 12 U.S.C. § 1818(b);
- (c) an “order issued with the consent of the depository institution” within the meaning of 12 U.S.C. § 1818(h)(2);
- (d) an “effective and outstanding . . . order” within the meaning of 12 U.S.C. § 1818(i)(1); and
- (e) a “final order” within the meaning of 12 U.S.C. § 1818(i)(2) and (u).

(4) This Order is effective upon its issuance by the OCC, through the Comptroller’s duly authorized representative. Except as otherwise expressly provided herein, all references to “days” in this Order shall mean calendar days and the computation of any period of time imposed by this Order shall not include the date of the act or event that commences the period of time. The provisions of this Order shall remain effective except to the extent that, and until such time as, such provisions are amended, suspended, waived, or terminated in writing by the OCC, through the Comptroller’s duly authorized representative. If the Bank seeks an extension, amendment, suspension, waiver, or termination of any provision of this Order, or within any plan or program submitted pursuant to this Order, the Board or a Board-designee shall submit a written request to the Assistant Deputy Comptroller asking for relief. Any request submitted pursuant to this paragraph shall include a statement setting forth in detail the special

circumstances that prevent the Bank from complying with the relevant provision(s) of the Order or plan or program submitted pursuant to this Order, and shall be accompanied by relevant supporting documentation. The OCC's decision concerning a request submitted pursuant to this paragraph, which will be communicated to the Board in writing, is final and not subject to further review.

(5) The Bank will not be deemed to be in compliance with this Order until it has adopted, implemented, and adhered to all of the corrective actions set forth in each Article of this Order; the corrective actions are effective in addressing the Bank's deficiencies; and the OCC has verified and validated the corrective actions. An assessment of the effectiveness of the corrective actions requires sufficient passage of time for the Bank to demonstrate the sustained effectiveness of the corrective actions.

(6) This Order is not a contract binding on the United States, the United States Treasury Department, the OCC, or any officer, employee, or agent of the OCC and neither the Bank nor the OCC intends this Order to be a contract.

(7) Each citation, guidance, or issuance referenced in this Order includes any subsequent citation, guidance, or issuance that replaces, supersedes, amends, or revises the referenced cited citation, guidance, or issuance.

(8) This Order applies to the Bank and all its subsidiaries.

(9) No separate promise or inducement of any kind has been made by the OCC, or by its officers, employees, or agents, to cause or induce the Bank to consent to the issuance of this Order.

(10) All reports, plans, or programs submitted to the OCC pursuant to this Order shall be forwarded, by overnight mail or via email, to the following:

William Russell
Assistant Deputy Comptroller
Comptroller of the Currency
Midsize Bank Supervision
400 7th Street, SW, Suite 2000
Washington, DC 20219

The Bank shall also provide a copy to the OCC Examiner in Charge.

(11) The terms of this Order, including this paragraph, are not subject to amendment or modification by any extraneous expression, prior agreements, or prior arrangements between the parties, whether oral or written.

IN TESTIMONY WHEREOF, the undersigned, authorized by the Comptroller as his duly authorized representative, has hereunto set his signature on behalf of the Comptroller.

/s/William Russell

1-7-2019

William Russell
Assistant Deputy Comptroller
Midsize Bank Supervision

Date

IN TESTIMONY WHEREOF, the undersigned, as the duly elected and acting Board of Directors of USAA Federal Savings Bank have hereunto set their signatures on behalf of the Bank.

s/Chad Borton	12/26/18
_____	_____
Chad Borton	Date
s/Anil Chakravarthy	12/27/18
_____	_____
Anil Chakravarthy	Date
s/Karen E. Dyson	26 Dec 2018
_____	_____
Karen E. Dyson	Date
s/Karen Hirtler-Gravy	12/26/18
_____	_____
Karen Hirtler-Garvey	Date
s/Carl C. Liebert III	12-29-18
_____	_____
Carl C. Liebert III	Date
s/Leo S. Mackay	12/26/2018
_____	_____
Leo S. Mackay	Date
s/Wendy J. Murdock	12/26/18
_____	_____
Wendy J. Murdock	Date
s/Stuart B. Parker	26 Dec 18
_____	_____
Stuart B. Parker	Date
s/G. Patrick Phillips	December 27, 2018
_____	_____
G. Patrick Phillips	Date
s/Robert Qutub	12/24/18
_____	_____
Robert Qutub	Date